Mount Diablo State Park

Appendices

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Appendix A

Mount Diablo State Park General Plan QUESTIONNAIRE BACKGROUND To be added to our mailing list, please give us your name and address:

1.	Name	
	Street Address	City
	Zip Phone (optional)	· ·
2.	Your primary interests are in	,
	natural resource preservation and interpretation	personal involvement (as a volunteer)
	cultural resource preservation and interpretation	concerned adjacent property owner
	recreation activities	government representative
	establishment of wildemess areas	agency: others
3.	What is your profession, occupation, or field of interest	?
4.	Do you have any knowledge, expertise, or contacts which team ?	s you would like to offer to the
	yesno_ If yes, please describe briefly and let reached:	us know how you can be
ΑC	TIVITIES	
1.	Please check activities which you feel are appropriate for	or this park;
	walking glider flying bit in the property of t	nature study hrsebkriding proup plenicking jogging iving history programs backpacking RV camping hanggliding enroute camping frisbee
2.	Of the items you have checked above, please list, in order emphasized within Mount Diablo State park:	er, the activities you feel should be
	A	
	B	
	C	
FA	CILITIES	
1.	bicycle trail bike camp all terrain bike campfire center trails camp store kite flying area horse rentals interpretive trail hostel	natural history MV campgrnd museum enroute camp horsetrail hike in camp jogging trail sanitat. sta. self-guided bike rentals interp. trail food concession shuttle service fam picnic sites envir educ onter
2.	Of the items you have checked above, please list, in ord are most important to include in the park	er, the five facilities you feel
	A	
	B	_
	C	
	E.	- -

	Comments:
4.	Do you see the need for improved or new park entrance roads?yesno
	Comments:
TNI	ERPRETIVE THEMES
1.	Please check interpretive theme subjects which you feel are appropriate for this park
	NATURAL FEATURES
	Plant communities California walnut Birds Geology Oak woodland/forest Native grasses Reptiles Paleontology Grassiand Native wildflowers Amphibians Climate Coastal sage scrub Juniper woodland Insects Geography Riparian woodland Rare plants Fish Fire ecology Chaparral Mammals Rare animals Others
	CULTURAL HISTORY
	American Indian resources Euroamerican history — Amer Indian his — American Indian activities — Mexican-Calif. activities — Mt. Diablo St.Pk. — Civilian Conservation Corps — Euroamerican resources — Cattle ranching — State Park story
2.	Of the items you have checked above, please list, in order, three interpretive theme subjects you feel are most important to include in the park.
	A
	B
	C
SU	MMARY
	1. What kind of place do you think Mount Diablo State Park should be?
	2. What should be the major concern in this long-range planning effort?
,	
	RETURN OF THIS QUESTIONNAIRE IS APPRECIATED! PLEASE MAIL TO :

STATE OF CALIFORNIA-RESOURCES AGENCY DEPARTMENT OF PARKS AND RECREATION MOUNT DIABLO STATE PARK PLANNING TEAM P.O. BOX 2390 SACRAMENTO, CA. 95811

ATTENTION: STUAFIT HONG

California State Department of Parks & Recreation Mount Diablo State Park BICYCLING SURVEY

BY FILLING OUT THIS SURVEY, YOU WILL BE HELPING THE STATE DEPARTMENT OF PARKS AND RECREATION STAFF BETTER UNDERSTAND HOW YOU USE THE PARK DURING YOUR BICYCLE RIDES.

THIS INFORMATION WILL ASSIST US IN IMPROVING SERVICES AND FACILITIES AT THE PARK. 1.WHY DO YOU RIDE AT MOUNT DIABLO STATE PARK? 2.WHAT ROUTE DO YOU USUALLY TAKE TO ENTER THE PARK? (check one) NORTH GATE ROAD SOUTH GATE ROAD ALTERNATE USE BETWEEN BOTH ROADS 3.WHAT ROUTE DO YOU USUALLY TAKE TO LEAVE THE PARK? (check one) NORTH GATE ROAD SOUTH GATE ROAD ALTERNATE USE BETWEEN BOTH ROADS 4. WHAT SEASON DO YOU USUALLY RIDE IN THE PARK? SPRING SUMMER FALL YEAR AROUND 5. WHAT PART OF THE WEEK AND TIME DO YOU USUALLY RIDE IN THE PARK? **WEEKDAYS** WEEKENDS **BOTH WEEKDAYS AND WEEKENDS** \mathbf{AM} PM 6. HOW MANY TIMES A YEAR DO YOU RIDE IN THE PARK? 1- 19 20- 49 **OVER 50**

7. WHAT IN	MPROVEMENTS ARE I	NEEDEL	0?
	REPAVE ROADS WIDEN ROADS PAVED TURNOUTS		MARKED DRINKING FOUNTAIN RESTROOMS @ PARK ENTRANCES OTHER
8. HOW DO	YOU ARRIVE AT THI	E PARK	?
	I PARK MY CAR NE I PARK MY CAR NE BLVD. AND BIKE IN I PARK MY CAR EL I BIKE FROM HOME	AR BLA I SEWHE	NO. GATE ENTRY STATION AND BIKE IN CKHAWK ROAD AND MT. DIABLO SCENIC RE AND BIKE IN
9. OTHER C	OMMENTS:		
YOUR EFF	SURVEY ALONG THE FORTS ARE APPRE DNG, PROJECT MANAC O STATE PARK GENE	CIATEI SER	O! THANK YOU!

STATE OF CALIFORNIA-THE RESOURCES AGENCY DEPT. OF PARKS AND RECREATION-DEVELOPMENT DIV. P.O. BOX 942896 SACRAMENTO, CA. 94296-0001

ATTENTION: STUART HONG

California State Department of Parks and Recreation VISITOR SURVEY

aidin facili	illing out this questionnaire, you will be g us in improving the services and ties of MOUNT DIABLO STATE PARK. appreciate your help!
Date	
Time	·
1.	Check the category that best describes your visit:
	Day-Use Camping
2.	Check the category that best describes your group:
	myself family/friends club/organization other
3.	How many persons including yourself, are in your group?
4.	What city are you from?
5.	Your sex? Male Female Age
6.	About how many miles did you travel to the park from home?
7.	How did you get to the park?

PLEASE FILL OUT BACK SIDE

U .	whole are you going in the park.		
9.	Is your visit to the park (check one): An unplanned part of a more extended trip A planned part of a more extended trip The destination of your trip		
10.	How many days will you spend at the park during this trip?		
11.	If you are camping, did you make a campsite reservation?		
12.	If you are camping, what type of sleeping shelter are you using?		
	Tent Automobile Motorhome, camper or van Tent trailer Other None		
13.	How many times have you visited this park before this visit? This is the first visit One to three times Four or more times		
14.	Circle the number indicating how important are to you on this visit to Mount Diablo State		listed below
	3 Important2 Somewhat1 Not as important		
b. H c. P d. C e. E f. B h. C i. H j. S	est and relaxation	2 2 2 2 2 2 2 2 2 2 2 2	1 1 1 1 1 1 1 1

PLEASE FILL OUT NEXT PAGE

15. Please give any comments, positve or negative, that might sum up the way you feel about your visit. Is there anything else you would like to see in Mount Diablo State Park?

THANK YOU FOR YOUR HELP! PLEASE GIVE THIS FORM TO A PARK RANGER, OR DROP IT OFF AT A PARK ENTRANCE/EXIT STATION.

Newsletter Number One

MOUNT DIABLO STATE PARK TODAY

Mount Diablo State Park is located in Contra Costa County, in the Central Coast Ranges. The state park is southeast of the Walnut Creek-Concord metropolitan area. Mount Diablo is within the San Francisco Bay Area metropolitan complex. About 5.4 million people live within a 40 mile radius. Nearly two million people live in direct visual contact of Mount Diablo, and about twice that many people in the nearby areas have a daily opportunity to see the hills from a distance.

Originally, the state park contained about 900 mountaintop acres. To date, nearly 15,600 acres have been acquired, and additional lands have been identified as having potential for inclusion in Mount Diablo State Park, bringing the potential size of the state park to over 16,000 acres.

CLASSIFICATION

Mount Diablo State Park was designated as a unit of the state park system on April 26, 1931, and was officially classified as a state park by the State Park and Recreation Commission in 1962.

The state park classification provides the department with guidelines for development, management, and operation of this unit. Public Resources Code Section 5019.53 defines a state park as

"State parks consist of relatively spacious areas of outstanding scenic or natural character, often times also containing significant historical, archaeological, ecological, geological, or other such values. The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of the ecological regions of California...

"Each state park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes to the extent compatible with the primary

Purpose for which the park was established."
"Improvements undertaken within state parks shall be for the purpose of making the areas "improvements undertaken within state parks shall be for the purpose of making the areas available for public enjoyment and education in a manner consistent with the preservation of natural, scenic, cultural, and ecological values for present and future generations. improvements may be undertaken to provide for recreational activities including, but not limited to,camping, picnicking, sightseeing, nature study, hiking, and horseback riding, so long as such improvements involve no major modification of lands, forests, or waters. Improvements which do not directly enhance the public's enjoyment of the resources, which are attentions in the problems, or which are attentions in the problems, or which are attentions. are attractions in themselves, or which are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks.

GENERAL PLAN STUDY

The State Department of Parks and Recreation is preparing a long range General Plan for Mount Diablo State Park. This plan will guide fut are programs, management, and development at the park over the next twenty years.

The plan is made up of the following seven elements:

- The Resource Element is a summary of the natural and cultural resources of the area, and sets the management policies for protection and use of these resources.
- The Land Use Element describes current and proposed land uses and relevant planning issues.
- · The Facilities Element describes facilities and programs.
- The Interpretive Element describes proposals and programs for interpretation of natural and cultural features of the park.
- The Operations Element describes specific operational requirements unique to the park.
- The Concessions Element describes appropriate service facilities necessary to meet public demand.
- The Environmental Impact Element analyzes proposed development in relationship to the California Environmental Quality Act (CEQA).

The General Plan is scheduled to be submitted in late 1988 to the State Park and Recreation Commission for its review and approval.

PLANNING PROCESS

WHERE WE ARE ...

Ó	STEP 1	ORGANIZING THE PLANNING JOB
Ó	STEP 2	GATHERING INFORMATION- Public meeting October 2
Ó	STEP 3	DEVELOPING ALTERNATIVES
Ó	STEP 4	COMPOSING A SINGLE PLAN
Ó	STEP 5	CEQA REVIEW PROCESS
Ó	STEP 6	STATE PARK AND RECREATION COMMISSION PUBLIC

PUBLIC INVOLVEMENT

In planning for Mount Diablo State Park, we would like to learn a whole range of things from you. We are requesting your participation in upcoming meetings, where together we'll discuss the future of the park.

We need your ideas and concerns on what recreation opportunities are needed, what facilities you would like developed, what lands should remain in their natural condition, and which natural, historical, and cultural values should be enhanced or interpreted.

The enclosed questionnaire is intended to provide you with your first opportunity to share your concerns with the planning team. You can mail it direct to us, or bring it to our first public meeting...

OCTOBER 2, 1985- 7:00 P.M.-10:00 P.M.

NORTHGATE HIGH SCHOOL THE LITTLE THEATER (Accessible to wheelchairs) 425 CASTLE ROCK ROAD WALNUT CREEK, CA. 94598

Any comments or questions about the recreation planning effort can be sent to the attention of Stuart Hong, Project Manager, or call us at (916) 445-3130.

We look forward to working with you!

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KERRY GATES
MOUNT DIABLO STATE PARK PLANNING
TEAM
CALIFORNIA DEPT. OF PARKS AND
RECREATION
P.O. BOX 2390
SACRAMENTO, CA. 95811

MOUNT DIABLO STATE PARK PLANNING TEAM CALIFORNIA DEPARTMENT OF PARKS AND RECREATION P.O. BOX 2390 SACRAMENTO, CA. 95811

> Newsletter 1

PREPARING A GENERAL PLAN FOR MT. DIABLO STATE PARK

For those of you who are receiving our newsletter for the first time, the California Department of Parks and Recreation is now in the process of preparing a comprehnesive general plan to guide the use and management of Mount Diablo State Park for years to come. On October 2, we held a public workshop to discuss the concerns and desires which people have for Mt. Diablo. The purpose of this newsletter is to share with you many of those concerns and to keep you informed about the progress of planning for the park.

THE OCTOBER 2 PUBLIC WORKSHOP

Over 80 people attended the October 2 workshop and we would like to thank each of you for your participation and your ideas about Mt. Diablo. Workshop participants formed ten separate working groups; these groups spent over two hours discussing park issues relating to picnicking and camping use, historic preservation, consolidation of communication equipment, the need for acquisition of additional park land, the southern entrance road to the park, grazing, wilderness, and many other concerns.

Here's a summary of the planning issues discussed by workshop participants:

CAMPING AND PICNICKING ISSUES

- o Park staff should assess use and provide insight about demand.
- Keep and add more isolated, smaller campsites i.e.: Bridal Nook and Maple Nook; don't consolidate.
- o' Day use facilities are most important.
- o Facilities are overcrowded during peak days.
- o Facilities are sufficient.
- o Facilities including trails are poorly maintained and need rehabilitation, especially Rock City.
- o Object to recreational vehicles in the park.
- o Need security in family use areas.
- o Camping and picnicking are not as important as other park issues.
- o Traffic is a problem.
- o Camping facilities are sufficient.
- o Provide a shuttle service as an alternative to driving at tomobiles up/down mountain.
- o Relocate camping to lower elevations possibly south side of park (Curry Canyon) since access would be easier.
- o Water facilities are lacking in isolated areas.
- o Expand camping facilities near major access roads.
- o Isolated camping is desirable.

HISTORIC PRESERVATION AND INTERPRETATION ISSUES

- o Don't expand rustic architecture.
- o Preserve examples of CCC work.
- o Educate public on CCC efforts in the park.
- o Architecture used now is suitable.
- o Interpret native American, Spanish and early American history.
- o Interpret fossils, geology, plant and animal life.
- o Provide research & study areas.
- o Continue using stone and wood materials for facilities.
- o Restore and protect the summit museum.
- o Diablo Ranch is of more interest than preserving rust c architecture,
- o Preserve Rock City.

SOUTHERN ENTRANCE ROAD

- o Existing road is unsatisfactory; unsafe.
- Recommend road realignment or variation between Athenian School and Blackhawk property.
- o The existing entrance road is privately owned. This is creating the issue of liability.
- o Existing road could be improved to meet county standards for county takeover.
- o Owners transfer fee simple title of road to state.
- o Straightening roads will increase speed; curves provide safety.
- o Use Blackhawk Ranch fire road for new access.
- o Possible to design a new road that doesn't require massive cuts and fills.
- o Government must take responsibility for road.
- o Don't use acquisition money.
- o Consider a shuttle bus system.
- o Alternatives need more study.
- o Establish a committee for alternate route.
- o Kiosk, staging area needed at park boundary.
- o Kiosk at state park boundary would cause traffic backup problems on weekends.
- o Oppose road realignment between Athenian School and Blackhawk.

GRAZING

- o Grazing not desirable on state park.
- o Grazing should be restricted.
- Grazing should be phased out over a period of years.
- o Where grazing is allowed, state should receive fair market value.
- o Incompatible with recreation uses.
- o Incompatible with sensitive natural areas i.e., creeks, streams, canyons, etc.
- No grazing on north side, Alamo and Sycamore Canyon.
- o Reduces fire hazard through the reduction of fire fuel.
- o Necessitates fencing which limits hiking.
- o The demonstration ranch is desirable.
- o Leases should be written between user and District Superintendent.
- o Fences need to be maintained.
- o Survey to find property boundaries is needed.
- o Set aside areas for restoration of pre-European ecology.
- o Grazing necessary to preserve habitat conditions.
- Range management assessment should be made by professional range management personnel rather than general park staff.

CONSOLIDATION OF COMMUNICATION FACILITIES

- Tower removal high priority, tower improvement low priority.
- o if technically feasible, towers should be consolidated.
- o Mountain should not be commercialized.
- o No more should be allowed.
- o Consolidation could produce unpleasing results.
- o Road reapirs have a higher priority than consolidation.
- o No city would want consolidated area facing them if view becomes unsigntly.
- o Consolidation proposal is worth further study; what are costs, tradeoifs, and what would be sacrificed?
- o Consolidation concept is desirable.
- o Revenue from proposal is desirable.
- o Concern expressed over asthetics of current situation.
- o Concern for cost of consolidation.
- o Consolidation is medium priority issue.
- o Proceed with consolidation (if owners can be persuaded that everyone was in favor of proposal.)
- o Keep towers near present roads to reduce impacts.
- o Fewer towers may be necessary due to technological improvements.
- a Move towers lower.
- o Put buildings under parking lot.
- o Limit facilities to present lower parking lot.
- o North Peak to Main Peak, proceed with consolidation effort.
- o Remove towers off North Peak.
- Return North Peak to Wilderness.
- Consolidation extremely important for park asthetics and use of North Peak by public and to accommodate demand for communications.

ACQUISITION

- New acquisition for horse staging area.
- o Yes, other lands should be acquired.
- o There should be adequate increase in personnel.
- o New acquisitions are best place for R.V.s.
- o Some will want to graze new acquisition lands.
- Acquistion issues should be discussed at November 7 public hearing.
- o New acquisitions will increase safety problems (especial y with fire).
- o Existing ranch takes care of grazing.
- o Yellow acquisition area (on map) is not a wilderness.
- o Camping facilities should be developed on new acquisitions.
- o Provide minimal access. Use new acquisition areas for hiking, riding and back country camping.
- o Preserve in a natural state.
- o Desire to see adjacent lands remain in natural state/open space. Limit to agricultural state.
- o Camping should not be moved, but added to.
- o New lands should have camping, hiking, horseback riding.
- o Additional lands to be acquired: west end around Tenderfoot Flat and Arroyo Del Ceno (going south).
- Opposed to acquisition of portions of sections 9, 5 and 5 (the're under Williamson Act) in Ginochio family for 3
 generations, now under sound ecological management.
- o Consideration should be given to local priority inputs. Consult locals.
- o Acquire most developable lands first.
- o Plan development after acquisition.
- o Keep Curry Canyon undeveloped.
- o No need to move existing facilities.
- o Acquire "inholdings", Athenian property, and necessary land to improve access.
- Should obtain land now. It will only get more expensive.
- o Proceed with Curry Creek, Clayton, and Walnut Creek properties.
- o Locate camping, picnicking, hiking and equestrian trails close to lower elevations and access points.
- o Buy everything possible.
- o No swimming pools.
- o Connect to trail systems.
- o Buy land by Athenian School entrance station.

- o Develop trailheads.
- o Don't move camping facilities to Curry Canyon.
- o If needed, a recreational facility could be located near entrance, but area should revert to passive recreation.
- Also desirable to round out parks and eliminate enclaves.
- o. No particular need for more development at this time.

OTHER ISSUES

- o Wilderness areas should be designated.
- o More perimeter staging areas needed.
- o Poor park maintenance.
- o Should be a safety element in general plan.
- o Park should not be made a wilderness area there's a wilderness feeling there now.
- o. What is the resource inventory and why don't you allow review and comments?
- o Seems there is a hidden agenda and a preconceived list of topics.
- Should address all-terrain bicycling.
- SCS should be consulted on general plan because of possible impacts downstream.
- o Vandalism control.
- o Fire roads are widened excessively.
- Natural eroding areas need assessment for maintenance decisions.
- o Revise fire protection plan.
- o Need comprehensive trails plan.
- o Rangers are understaffed.
- o All needs of Mount Diablo are important and should not be neglected.

WHAT HAPPENS NEXT?

We are now in the process of tabulating and analyzing the information you gave us. We will take your ideas along with natural and cultural resource data about the park and begin to define the problems the general plan should solve. As the problems become clear, we will prepare several alternative plans for solving them. Early next year, when alternative plans have been formulated, we will notify you and invite you to another workshop to evaluate them. Your evaluation will help us work towards a single proposed general plan for Mt. Diablo State Park.

Thank you for your ideas and your involvement. Any comments or questions can be sent to Stuart Hong, Project Manager, or call us at (916) 322-7194. We look forward to seeing you again.

MOUNT DIABLO STATE PARK PLANNING TEAM CALIFORNIA DEPARTMENT OF PARKS AND RECREATION P.O. BOX 2390 SACRAMENTO, CA 95811

PLANNING PROCESS

Where we are...

	STEP 1	ORGANIZING THE PLANNING JOB
	STEP 2	GATHERING INFORMATION
=	STEP 3	DEVELOPING ALTERNATIVES
	STEP 4	COMPOSING A SINGLE PLAN
	STEP 5	CEQA REVIEW PROCESS
	STEP 6	STATE PARK AND RECREATION COMMISSION PUBLIC HEARING OF PLAN

MOUNT DIABLO STATE PARK PLANNING TEAM CALIFORNIA DEPARTMENT OF PARKS AND RECREATION P.O. BOX 2390 SACRAMENTO, CA 95811

NEWSLETTER 2

NewsletterMount Diablo State Park

Number 3

BENERAL PLAN UPDATE

During the last public meeting, we heard the concerns and desires people have for Mount Diablo State Park. Since then, we have had a number of discussions with local government representatives, environmental groups, cattlemen associations, homeowner groups, bicycle clubs, and school board members. Over 500 questionnaires, which asked your opinions about park needs, have been completed and returned to us. Hundreds of letters and telephone calls have been received from individuals who made suggestions on the future of the State Park.

All of the your comments and suggestions are being closely examined and will provide the foundation for the alternative planning phase. We will be working on alternative plans during the next two months. We will announce the public meeting to review these plans and to hear your suggestions and comments at a later date.

PRELIMINARY RESOURCE ELEMENT

Park staff has been busy completing the Preliminary Resource Element. The Resource Element is one of six elements that make up the General Plan and is intended to define policies to guide the management and use of natural and cultural resources in the park. The General Plan will guide future programs, management, and development at the State Park over the next twenty years.

We have scheduled a public meeting to review the Preliminary Resource Element on January 29. Your comments are important in order for us to prepare a final Draft Resource Element which will provide park staff with a guide to prepare subsequent elements of the General Plan. The Draft General Plan will be available for public review several months prior to our scheduled presentation to the Park and Recreation Commission in February 1988 for final approval.

Included in this newsletter, are some of the important recommended resource policies of the Preliminary Resource Element.

NEXT PUBLIC MEETING

The meeting will be held:

Thursday January 29, 1987 at 7pm. - 10pm.

Walnut Creek City Hall Council Chambers

1666 North Main Street

Walnut Creek

At this meeting, park staff will present highlights of the Preliminary Resource Element. The purpose of the meeting is to hear your comments and to answer questions on the Resource Element.

PRELIMINARY RESOURCE ELEMENT

Background

This Resource Element was prepared to meet the requirements of the Public Resources Code and California Administrative Code. The Resource Element sets long range management objectives for the scenic, natural, and cultural resources of the unit, and specific actions or limitations required to meet these objectives. Specific resource management plans will be prepared at a later date.

The Resource Element also identifies specific resources, their sensitivities and physical constraints, and establishes Department guidelines for acceptable levels of use and development.

Mount Diablo was classified a State Park by the State Park and Recreation Commission in 1963. Classification establishes management and public use direction and protection under the California Public Resources Code.

The Classification Act establishes several subcategories of units that may be included within the boundaries of a unit of the State Park System. These categories include State Wilderness, Natural Preserve, and Cultural Preserve. Each of these categories may be appropriate to Mount Diablo State Park.

The following are recommended policies for some of the most important resource issues;

Livestock Grazing

Livestock grazing will be used in Mount Diablo State Park only for explicit park management or interpretive purposes. Livestock grazing may be used to achieve specific resource management purposes on an experimental basis or for interpretive purposes over a limited area, when the projected benefits outweigh the negative impacts to the affected resources. Livestock grazing in conjunction with park interpretive programs shall be limited to those areas that the Department determines are necessary for interpretation.

Ecological Restoration of Fire

Fire as an ecological process shall be restored to the plant communities at Mount Diablo State Park through the techniques of prescription burning. A unit wide prescribed fire management plan shall be developed following the Department's policies and guidelines. This plan shall be consistent with and made a part of the vegetation restoration and management plan.

Fire Prevention and Suppression

The Department shall work with the California Department of Forestry, Contra Costa County Fire Department, and other appropriate agencies to implement a Wildfire Management Plan at Mount Diablo State Park. This plan shall address all aspects of wildfire burning, including prevention, presuppression, and suppression. The plan shall identify modified fire suppression methods designed to preserve sensitive park resources while protecting human lives and facilities.

Riparian Zone Management

Riparian ecosystems within Mount Diablo State Park shall be protected. Concentrated visitor use and livestock grazing shall be excluded from riparian zones. Recreational facilities and activities within, or in close proximity to, riparian zones shall be closely monitored and controlled. Riparian areas shall be addressed in the vegetation restoration and management plan and appropriate restoration and protection measures shall be identified and measured.

Native Grass Management

Restoration and enhancement of native grasslands and woodland understories shall be addressed in the vegetation restoration and management plan. The plan shall include identification of populations of native grasses in the State Park, and appropriate restoration and management actions including techniques such as prescribed burning and the control of non-native species.

Oak Management

Natural diversity of age classes shall be restored and maintained in oak populations in Mount Diablo State Park. Regeneration among the oak tree species shall be addressed in the vegetation restoration and management plan, and appropriate restoration and protection measures shall be identified and implemented. A program to monitor oak regeneration from seeds and mortality shall be the basis for identifying management .needs and assessing the effectiveness of the program.

Rare or Endangered Plant Species

Rare or endangered plants within Mount Diablo State Park shall be protected and managed for their perpetuation in accordance with state law.

Systematic surveys for rare and endangered species shall be made throughout the unit. For each species, populations shall be mapped and a management plan for its protection and perpetuation shall be prepared and implemented as a part of the vegetation restoration and management plan. Prior to any potentially harmful activity, including site specific development, trail or facilities construction or relocation, or prescribed burns, additional surveys for rare or endangered plants shall be made during the appropriate flowering season in the areas that will be impacted.

California Conservation Corps Architecture

The Department shall strive to maintain the architectural and historic integrity of CCC structures. The Department should not modify the exterior appearance of CCC structures and facilities, nor the interior of those structures where the historic fabric remains unaltered. Compatible materials, consistent with the style and character of the structures, should be used in maintenance and repair.

Communication Facilities

The goal shall be to reduce the negative visual impacts of transmission facilities and easements required to maintain them. To this end, lessees shall be encouraged to modify their facilities so that the negative visual impacts are minimized. The Dept. shall work toward the consolidation of communication facilities on Mount Diablo, and the eventual removal of all communications structures from North Peak.

Allowable Use Intensity

The California Public Resources Code requires that a land carrying capacity survey be made prior to the preparation of any development plan for any park or recreation area. The Code further requires that attendence be held within limits so established. Allowable Use Intensity is a refinement of the land carrying capacity concept. Three use intensity categories have been established. For further details see the RE.

COMPLETE PRELIMINARY RESOURCE ELEMENTS AVAILABLE

Copies of the Preliminary Resource Element are available for your review at the following locations:

Central Library

Concord Branch Library

Walnut Creek Br. Lib. 1644 North Broadway

1750 Oak Park Blvd.

2900 Salvio St.

Pleasant Hill 944-3434

Concord 671-4455 **Walnut Creek** 934-5373

San Ramon Valley Branch Library

555 South Hartz Ave.

Danville 837-4889 State Dept. of Parks and Rec.

Diablo District Office

4180 Treat Blvd., Concord

687-1800

COMMENTS? QUESTIONS?

If you have any comments, questions, suggestions, etc. on the Preliminary Resource Element that you would like to submit prior to the public meeting or if you cannot make the public meeting send them to:

Gary Fregien

State Parks and Recreation Resource Protection Division

P.O. Box 942896

Sacramento, Ca. 94296-0001

Mount Diablo State Park Planning Team

California Department of Parks and Recreation P.O. Box 942896

Mount Diablo State Park newsletter

Issue number 4 February 1987

During the January 29 public meeting, we heard the concerns and comments people have regarding the Preliminary Resource Element and the Preliminary Interpretive Element of the General Plan for Mount Diablo State Park. The purpose of this newsletter is to share with you those concerns and to keep you informed of what happens next in the planning process.

RECAP OF THE JANUARY 29 PUBLIC MEETING

Over 200 people attended the meeting and we would like to thank each of you who were able to participate. Fifty-four speakers made comments and recommendations in reaction to the draft elements. Most people were concerned with the policies regarding grazing and related issues such as fire prevention and suppression, native plants, and the interpretive cattle ranch. We also heard comments about hiking and equestrian trails, telecommunication tower consolidation, and cultural history.

HERE'S A SUMMARY OF WHAT WE HEARD...

GRAZING

PRO-GRAZING:

- •Grazing is a proven, economical, in-place, method to reduce fire hazard.
- •No state funding is available to pay for alternative fire reduction techniques.
- Faculty from nursery schools to state universities support the demonstration ranch as a unique interpretive opportunity in an authentic working ranch setting.
- •Grazing has occurred on Mt. Diablo for over 200 years without a significant adverse impact on the resources.
- •Resource damage alleged in the Resource Element is not acknowledged by some resource professionals with substantial experience on Mt. Diablo.
- •Grazing animals have always been an integral part of grassland ecology.
- Proper livestock grazing can help preserve open grasslands by preventing succession to brush.
- Proper livestock grazing can encourage wildflower production.
- •Grazing is appropriate for a multi-use park like Mt. Diablo.

- The "Declaration of Purpose" should specifically acknowledge the preservation of the demonstration ranch as cultural heritage preservation.
- •After 200 years, livestock grazing is now a part of the "natural scene" of Mt. Diablo State Park.
- •Ranchers fear a precedent for removing grazing from public park land will be set if grazing is removed from Mt. Diablo.
- The positive aspects of grazing are not presented.
- •The Department of Parks and Recreation has already decided on how to deal with grazing without involving affected local people and government agencies in the planning decision. Outside experts and knowledgeable locals should be included in "consensus planning".

ANTI-GRAZING:

- •Grazing is only an effective means of reducing fire hazard when an area is overgrazed.
- •A demonstration ranch is fine, but not if it requires one-half of the park to be grazed (over 7000 acres) to support it.
- •Eliminating grazing will allow oaks to regenerate.
- •Eliminating grazing will allow native grasses and wildflowers the chance to be reestablished.
- •Cattle compete with deer for food.
- •Water sources are polluted by cattle.
- •Riparian areas are destroyed by cattle; erosion is exacerbated.
- •Mt. Diablo is classified as a State Park and should be managed as a preserve, not as rangeland.
- •Recreational use is not compatible with cattle grazing. Hiking is spoiled by fencing, odor, flies, and "hazardous" footing.
- •The public benefits of grazing over 7000 acres of park land do not justify the cost to resources and visitor experiences.
- •Cattle are not native and do not belong in a park. People can go to a ranch if they want to see cattle.
- •Cattle grazing is in conflict with potential wilderness designation.
- •Native animals and other forms of nature should be preserved at the park.

HIKING AND EQUESTRIAN TRAILS

- •There are too many trails in the park!
- •Some of the trails should be removed.

TELECOMMUNICATION CONSOLIDATION STUDY

- •We hope the consolidation of the North Peak towers on to the South Peak can occur.
- •The cooperation of the two "opposing forces" (environmentalists and the telecommunication providers) should help answer the needs of both sides.

CULTURAL HISTORY

- •Native American interpretation should be increased.
- •The CCC constructed facilities should continue to be preserved.
- •The Euroamerican standing structures are never mentioned.

GENERAL COMMENTS

- •The scientific references must be included in the Resource Element.

 This will help separate fact from opinion.
- •The Resource Element is extremely basic. All of your suppositions must be proved to be correct.
- •What is the definition of "natural"? There is disagreement.
- •There is a need to have a professional range manager at the park.
- •What is the "Declaration of Purpose" for the park?

WHAT HAPPENS NEXT?

Staff is analyzing the information presented and revisions will be considered to both the Preliminary Resource Element and the Preliminary Interpretive Element. During the next several months, we will be busy working on alternative land use plans. These plans will reflect any revisions to the Resource and Interpretive Elements. You will be notified by mail in Newsletter Number 5 where the Resource and Interpretive Elements can be reviewed. Also, Newsletter Number 5 will announce the third public meeting to review and comment on the proposed alternative plans. Your evaluation will help us formulate a single plan. Our staff will refine the single plan for your review at a fourth public meeting. The printed general plan will be submitted to the State Park and Recreation Commission in late 1988. There, too, you will have an opportunity to comment on the plan.

For additional information contact:

Mount Diablo State Park General Planning Team California Department of Parks and Recreation P.O. Box 942896 Sacramento, Ca. 94296-0001

Attention: Stuart Hong

The Planning Process... Where we are:

STEP 1	ORGANIZING THE PLANNING JOB
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STEP 2	GATHERING INFORMATION
	MATHERING INFORMATION

STEP 4	COMPOSING A SINGLE PLAN
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	STEP 6	STATE PARK AND RECREATION COMMISSION HEARING
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Mount Diablo State Park Planning Team

California Department of Parks and Recreation P.O. Box 942896 Sacramento, Ca. 94296-0001

newsletter

The General Plan Update

se Five September 1987

Mount Diablo State Park

The Third Public Meeting

Our next public meeting will be held: September 22, 1987, 7p.m.-10p.m.

Northgate High School

Little Theater

425 Castle Rock Road

Walnut Creek, CA 94598

Park staff will be presenting the Department's findings and recommendations of the draft Resource Element (RE) and the draft Interpretive Element (IE)

Recap since the last public meeting

At the January 29 public meeting, park staff heard the concerns and comments people had regarding the preliminary Resource Element (RE) and Interpretive Element (IE) of the General Plan for Mount Diablo State Park. As you are aware, the RE will set resource management goals while the IE will set goals for interpretation of park resources.

Most comments from the meeting concerned cattle grazing. Since we met last, staff has analyzed all of the comments presented at the meeting and from the hundreds of letters we have received. We have had meetings with UC Agricultural Extension representatives, local ranchers, local fire districts, special interest groups, and we've had additional meetings with local government officials to help us revise the preliminary RE and IE. Because most people from our last meeting had concerns about cattle

grazing, we are limiting our summaries to this important issue. Please refer to the complete RE and IE for a thorough analysis of all the issues.

Resource Element: Summary of Findings

· Mount Diablo was established as a State Park because its scenic and natural features were so outstanding that they deserved to be preserved in accord with Public Resources Code (PRC) 5019.53 which states, "... The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of such ecological regions of California as ... foothills and low coastal mountains... Each park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes."

- The Department of Parks and Recreation (DPR) actively manages natural resources in order to restore and maintain native environmental complexes using natural ecological processes (Dept. of Parks and Rec. Operation Manual #1830).
- DPR defines the terms "native and natural" as used in the PRC and the RE to mean the plants and animals, conditions, and processes that evolved in California prior to the intervention of Euroamericans.
- State Parks are special purpose reservations, as opposed to multipurpose lands managed by other public agencies and the private sector

Public and private lands managed for commodity production and other uses are general purpose or multi-purpose in principle.

Parks are established to protect and perpetuate intrinsic values, both natural and cultural; parks were not established for their utilitarian worth.

•State Park and Recreation Commission policy states "Generally, grazing or agricultural leasing is considered incompatible in units of the State Park System. However, the director may permit grazing in the State Park System when it is for the benefit of the plan and purpose of the State Park System and the Commission is advised of this action. The director shall carefully weigh the environmental consequences of grazing and agricultural leasing on the natural or cultural resouces of any unit". (Park and Rec. Com. policy no. 31.)

- The Department does not recognize fire hazard abatement as an adequate justification for livestock grazing;
 effective fire hazard reduction is only achieved by overuse through livestock grazing.
- Livestock grazing will be used in Mount Diablo State Park only for explicit park management or interpretive purposes. Livestock grazing may be used to achieve specific resource management purposes on an experimental basis or for interpretive purposes over a limited area.

Interpretive Element: Summary of Findings

- Historic ranching merits interpretation in the park because of ranching's importance to the Diablo area's early development.
- Given the excellent interpretation of turn-of-the-century ranching at the adjacent Borges Ranch, ranching interpretation at Mount Diabio State Park should emphasize the earlier Mexican Rancho Period:
- Extensive interpretation of modern ranching is more properly done by the cattle industry.
- Useful media for ranching interpretation include: tours, demonstrations, talks, exhibits, publications, and audiovisual productions. Only tours and demonstrations require an interpretive ranch and herd, but because they are active they are particularly effective media.
- Grazing park land to support an interpretive herd has some negative impacts on recreational and natural

resources. To keep these costs in scale with the interpretive benefits of the herd, the number of cattle should be limited to what is needed for interpretation. The grazing site and period should be carefully selected to minimize conflicts.

- The herd size needed for interpretation is estimated at 100 head plus their calves. The interpretive herd would be owned and managed by a full time rancher whose major operation occurs elsewhere.
- About 600-1000 acres of park land would be needed to support the interpretive herd. Areas of conflicting recreational use and ecological sensitivity will not be grazed. Grazing will be limited to the peak grass production months (approximately December through May). The interpretive range should be located adjacent to the interpretive ranch site.
- The interpretive ranch site should be on park land to provide maximum public access and control of the program and facilities. It should be

located at a historic ranch site with good parking and adequate space for large scale events.

- Interpretive development could include an exhibit and activity shelter adapted from a historic barn; a Rancho period stick corral and brush shelter; as well as needed modern corrals, chutes, and equipment.
- The interpretive programs will emphasize the Mexican Rancho period while comparing historic and modern ranching techiques, clothing, and equipment. The interpretive concessionaire will interpret routine cattle handling as a normal part of work. Trained interpretive ranch docents or rangers would: offer ranch tours to organized groups; make and use historically accurate clothing and tack; help the concessionaire interpret modern techniques; and work with interested groups and local park staff to sponsor an annual community. wide celebration of the area's ranching history and tradition.

Final draft Resource Element and Interpretive Element available

Copies of the drafts will be available for your review on September 14 at the following locations:

State Dept. of Parks and Rec.
Diablo District Office
4180 Treat Boulevard
Concord
687-1800
Central Library
1750 Oak Park Boulevard
Pleasant Hill
944-3434
Concord Branch Library
2900 Salvio Street
Concord

Walnut Creek Branch Library
1644 North Broadway
Walnut Creek
934-5373
San Ramon Valley Branch Library
555 South Hartz Avenue
Danville
837-4889

671-4455

Other General Plan Elements

Staff will now begin work on the other elements of the General Plan. Here's a brief description of the remaining elements:

- Land Use Element will consist of graphic and written descriptions of areas within the park that are environmentally suitable for various intensities of use consistent with the park's Declaration of Purpose.

 The fourth public meeting tentatively scheduled for early 1988 will be to present alternative land use plans for your review and comment.
- Facilities Element will consist of graphic and written descriptions of the physical facilities, including interpretive facilities, that will be developed to accomplish the park's purpose. Design parameters for each type of facility will be proposed.
- Concessions Element consists of an evaluation of existing concession activities, potential for additional visitor services and revenues, and appropriate concession policies.
- Operations Element defines how the Operations Division will carry out its responsibilities to operate the park and maintain its facilities, protect the resources, serve the park visitors and provide interpretation, enforce the law and ensure proper park use; and implement statewide standards for maintenance, safety, equipment management, signing, communications, and law enforcement.
- Environmental Impact Element-CA. Environmental Quality Act (CEQA) Compliance discusses: (a) the environmental impact of development of the park; (b) any adverse environmental effects which cannot be avoided if the park is developed; (c) mitigation measures

proposed to minimize the impact; (d) alternatives to development of the park; (e) development of the park as it relates to the relationship between local short-term uses of the environment and the maintenance and enhancement of its long-term productivity; (f) any irreversible environmental changes which would result from developing the park, and; (g) the growth-inducing impact of developing the park.

The General Plan is now scheduled to be submitted in late 1988 to the State Park and Recreation Commission for their review and approval.

We welcome your questions and comments...

For additional information direct your questions to:

- Stuart Hong (for general information)
- Gary Fregien (for Resource Element information)
- Bob Hare (for Interpretive Element information)

Mount Diablo State Park General Planning Team California Department of Parks and Recreation P.O. Box 942896
Sacramento, CA 94296-0001

The General Planning Process...

where we are:

- Step 1 Organizing the job
- Step 2 Gathering information
- Step 3 Developing alternatives
- ☐ Step 5 CEQA Review Process
- ☐ Step 6 State Park and Recreation Commission Hearing

State of California
Department of Parks and Recreation
Mount Diablo State Park
General Planning Team
P.O. Box 942896
Sacramento, CA 94296-0001

newsletter

General Plan Update Issue Number 6

Mount Diablo State Park

June 1988

Fourth Public Meeting

Our next public meeting will be held: June 30, 1988, 7pm-10pm Pleasant Hill Elementary School Multi-Use Room 2097 Oak Park Boulevard

Pleasant Hill

Park staff will be presenting highlights of the county approved Wildfire Management Plan and we will discuss alternative plans for Mount Diablo State Park.

What We've Done to Date

wildfire Management Plan...
Since the September meeting, the department has met extensively with all the local fire protection districts and we have completed a comprehensive wildfire management plan.

On April 26, 1988, the Contra Costa County Board of Supervisors unanimously passed resolution no. 88/220 which approved the wildfire management plan and authorized the fire chiefs of Contra Costa, Eastern Diablo, and Tassajara Fire Protection Districts to sign the plan. (San Ramon Fire Protection District, which is an independent district, has also signed the plan.)

Major components of the Wildfire Management Plan include:

- Defining responsibilities to prevent and suppress fires.
- Organizing a procedure to attack wildfires.
- Alerting fire control agencies to the park's resource sensitivities.
- Perimeter fuel break of 51 miles.
- Weed abatement around structures and facilities.
- Year-round brushing of 100 miles of perimeter and internal fire breaks and trails.
- · Brushing, controlled burns, and

grading along 41 miles of burn compartment boundaries.

- Mowing or spraying of 25 miles of public access roads.
- Annual meetings with local fire districts and Department of Forestry personnel.

Although grazing is not an element of the wildfire management plan. grazing will not be removed until the plan is funded and in place.

A copy of the wildfire management plan is available for your review at the State Dept. of Parks and Recreation, Diablo District Office, 4180 Treat Blvd., Suite D, Concord.

The Next Public Meeting

The June 30 public meeting will be divided into two parts:
First, we will use a workshop format to allow us to discuss, hear, and write recommendations

regarding land use planning for the park.

Secondly, we will present a summary of the county approved wildfire management plan.

The "Alternative Land Use Workbook", which will be passed out at

the meeting, will help us focus on deciding what kind of place we want Mount Diablo State Park to be.

The workbook will include a summary of existing factors and concerns and a list of alternatives for potential changes and new development for various categories such as recreation, interpretation, land management, transportation, and operations.

The alternatives were developed from public input from the three previous public meetings, user surveys, letters, meetings with county and city representatives, and numerous meetings with other groups.

To get everyone thinking about land use planning, please consider the following:

General Plan Principals

- The purpose of Mount Diablo State Park is to preserve its intrinsic scenic, natural, cultural, and recreational resources while making them available for public enjoyment.
- Mount Diablo State Park is significant both for its intrinsic natural and recreational values and for its accessibility to over 5 million people within one hour's drive.
- Mount Diablo State Park is a spacious, diverse and rich area being used for many kinds of recreation activities.
- If maximum use levels are not set, the ever-increasing recreational demands of an expanding population would eventually harm the park's natural and cultural resources as well as the quality of the recreational experience.

Goals of the General Plan Recreation

- Provide opportunities for park visitors to appreciate Mount Diablo's unique natural, cultural, and scenic resources.
- Meet appropriate and diverse recreational needs.
 - a. Avoid conflicts between recreational uses.
- b. Promote safety.
- c. Promote day use and overnight activities.
- d. Provide handicapped access and facilities where feasible.
- Spread the recreational development and activities throughout the park to avoid adversely impacting any one area and to increase the park's visitor capacity.
- Plan facilities and programs to tie into nearby local recreation areas and trails.

Interpretation

- Help visitors more fully enjoy, understand, and protect the mountain's natural, cultural, and recreational resources making them available for public enjoyment.
- Develop topics, facilities, programs, and appropriate media consistent with the park's purpose, people's interests and the relative importance of the resources.
- Make programs and facilities accessible to the handicapped where practical.
- Actively involve the public in interpretation through volunteer and docent programs.
- Cooperate with other local agencies in interpreting the area's natural and cultural resources.

Land Management

- Ensure the perpetuation of the park's natural resources through natural processes.
- Preserve significant cultural resources.
- Preserve recreational, scenic, and natural resources.
- Provide and implement a wildfire management plan consistent

- with public safety and sound park management.
- Acquire needed properties, including inholdings that become available, to protect state park values and to tie into nearby local and regional recreation areas and trails.
- Minimize the visual impacts of telecommunication towers, power lines, roads, firebreaks, and other unnatural developments.

Transportation

- Balance the transportation requirements with the need to preserve the resources visitors have come to see.
- Provide a balance between park access and park security.
- Limit road facilities to those which serve the park.

Operations

- Provide needed public and operational utilities and facilities while minimizing their impacts on the resources.
- Provide adequate staffing for a safe, well managed, well protected, and well interpreted park.
- Encourage the appropriate use of volunteers and docents.

What Kind of Place Should Mount Diablo State Park Be?

Concept #1- Leave the Park as is but rehabilitate worn facili-

ties

Mount Diablo SP, as an area of outstanding natural and scenic character surrounded by rapid development, should remain as it is, although the existing facilities, e.g. roads, day use and camping facilities, etc., should be rehabilitated. Low intensity recreation or reduced facilities should be emphasized.

Objectives:

- Do not expand any uses and/or facilities.
- Rehabilitate existing facilities if needed.
- Revert unnecessary or little used existing developed areas back to

their natural state or to a less developed area by reducing the number of facilities.

Concept #2- Moderate new

recreation development
This concept includes the rehabilitation features of #1 and recommends that any additional improvements should be generally restricted to areas near existing
roads.

Objectives:

- Develop interpretive facilities,
 e.g. Summit Museum, panels,
 signs, displays, etc., to interpret
 the park's unique cultural and
 natural resources.
- Establish more trail heads and develop several small parking areas just off the main roads to establish short rides or hikes to increase trail access to areas now committed to grazing.
- Improve and expand, if needed, existing facilities, to better meet increased use.

Concept #3- Restricted major

recreational additions
This concept includes all of the features of #1 and #2 plus major recreation improvements to be confined to limited areas of the park to minimize their impact on the park as a whole and maximize preservation of natural values and open space.

Objectives:

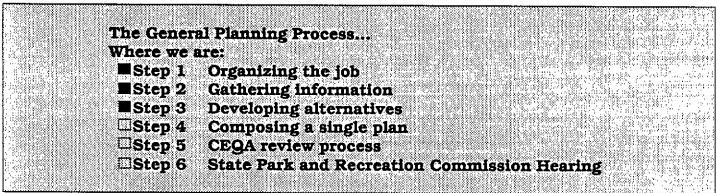
- Establish major recreational facilities, e.g. interpretive/ nature/information centers, campgrounds, day use areas, an astronomical observatory, etc., in selected locations throughout the park to help meet the growing recreational demands.
- Develop low-intensity facilities near the park's creeks and ponds, scenic vistas, and other natural attractions.
- Develop perimeter campgrounds and hiking/staging areas to lessen the demand and traffic on park roads and provide more accessible facilities and access points.

This general information should help you to begin to think about alternative land uses for the park. The alternative land use workbook, to be passed out at the meeting, has detailed alternatives covering the full range of issues and concerns we have heard. We plan to put everyone to work on June 30 to help provide the needed input so we can develop a single long-range plan for the park.

If You Can't Attend Our Next Meeting...

and you would like to be involved with the land use planning for the park, please notify:

Mount Diablo State Park General Planning Team Dept. of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001 We will send you a workbook regarding land use alternatives for the park or you can pick up a copy at the Diablo District Office, 4180 Treat Boulevard, Suite D, Concord. Your responses combined with what we hear at the public meeting will help us formulate a preliminary plan which will be discussed in a future newsletter and at the fifth public meeting.



State of California
Department of Parks and Recreation
Mount Diablo State Park
General Planning Team
P.O. Box 942896
Sacramento, CA 94296-0001

newsletter

General Plan Update Issue Number 7

Nount Diablo State Park

January 1989

Fifth Public Meeting

Our next public meeting will be held:

January 25, 1989, 7pm-10pm

Pleasant Hill Elementary School

Multi-Use Room

2097 Oak Park Boulevard

Pleasant Hill

Park Staff will be presenting a single land use plan and highlights of the preliminary Land Use and Facilities Element.

GENERAL PLAN UPDATE

To those of you who weren't able to attend the last meeting in June, over 80 people took part in reviewing alternative land use plans and giving us their specific long-range recommendations for the park.

"Alternative Land Use Workbooks" were used to receive public input. The land use alternatives were based on our concerns for preserving and protecting the park's resources and on information collected during the previous public meetings, meetings with special interest groups, user surveys, letters, and from statewide recreation needs.

Working in small groups, the participants assessed various land use and facilities options and made some of their own recommendations to create a plan which the group felt to be the best plan for development of facilities and use of the park.

Since we saw you last, staff attempted to resolve the sometimes conflicting recommendations made by group and individual plans by putting together a draft Land Use and Facilities Element, containing what the planning team believes to be the most feasible and appropriate plan for the management and use of the park.

After hearing public comments on the land

use and facilities plan at the January 25 meeting, the planning team will put all elements (Resource Element, Interpretive Element, Land Use Element, Facilities Element, Concessions Element, and the Operations Element) of the plan together into a draft general plan. The draft will be available for public review and comment in May 1989 during the California Environmental Quality Act review process. The draft general plan will be presented to the Park and Recreation Commission for approval in August 1989.

THE SINGLE PLAN

To compose the single plan, the planning team studied the results of all the public meetings, meetings with local government planners and special interest groups, user surveys, letters, and the input from the multidisciplinary general planning team. Our primary concern in locating uses and facilities at the park is how to best satisfy the identified needs while protecting the park's resources.

The major identified needs include:

- Preservation and protection of significant natural and cultural resources
- Facilities and programs for natural, cultural, and recreational interpretation
- Improvement and rehabilitation of existing day use areas, camping facilities, and roads
- Additional day use areas and camping facilities
- Additional trail access points around and in the park
- Acquisition of properties to protect state park values and to tie into local recreation areas

PLAN CONCEPTS AND RECOMMENDATIONS FOR LAND USE AND FACILITIES

General Land Use

Increase recreation opportunities and enhance visitor's experience:

- Recreation activities are to continue to be low to medium intensity in use areas.
- Existing facilities and areas are to be rehabilitated and made more efficient and upgraded to better accommodate and encourage recreation use.
- Day-use and overnight facilities will be increased.

Disperse recreation use around the mountain:

- Attract visitors to appropriate low-use areas by improving the areas and providing needed facilities.
- Provide more park access points by developing strategically located staging areas and parking areas.
- Develop new recreation use areas:
- -an interpretive area at Macedo Ranch
- a handicapped campground (also available for general public use) to be located in Riggs Canyon in the southeast section of the park
- -a lower elevation campground in the north east section of the park
- -new access points in and around the perimeter of the park
- -revitalize Pine Pond to create a more attractive water feature

Preserve the character and natural beauty of the Mount Diablo Landscape:

- Maximize open space:
 - -Designate "open space zones" where no development can occur and the area can maintain or revert back to a natural state. Regular operations and maintenance can still take place.
 - -Restrict new development to appropriate areas near existing roads.
 - -Concentrate recreational development whenever possible.

- -Locate new development adjacent to existing development or along margins of scenic or open areas where existing vegetation, land forms, or screening will minimize visual impacts.
- -Substantially reduce livestock grazing to what is minimally needed to provide cattle-handling demonstrations (but not more than 1000 acres).

Note: Grazing will not be removed until the Wildfire Management Plan is funded and in place.

Serving the public:

- Develop controlled park access points.
- Provide adequate maintenance facilities to meet present and future demands.

Transportation and Circulation

<u>Encourage non-automobile transportation</u> to and within the park:

- Improve, maintain, and sign the hiking and riding trail system.
- Encourage local transit systems (no large buses) to provide scheduling to the park when economically feasible.
- Encourage local government agencies to plan and implement hiking and bicycle trail systems connecting to the park.
- Develop new park trails where possible to connect park use areas, and make trails accessible to the handicapped where feasible.
- Continue to allow bicyclists on paved park roads.
- Allow mountain bicyclists on fire roads west of Southgate Road and south of Northgate Road. Other fire roads will be considered for mountain bicycle use after further study.
- Provide a shuttle service from North Gate and South Gate entrances up to the Summit—at such time as service of this nature is determined to be economically feasible.

Emphasize low-impact/esthetic design criteria for new roads and utilities:

 Design and site roads for minimum environmental impact and visibility.

- Use sensitive road grading including rounded and revegetated cut and fill slopes.
- Consolidate telecommunication towers and equipment where feasible and cost effective.
- Locate utility lines out of view (underground where feasible).

Balance recreational use with resource and facility capacities:

- Do not develop major new facilities along North Gate, South Gate, and Summit Roads.
- Soive potential traffic and access problems along Finley Road by acquiring appropriate properties and developing needed facilities such as a controlled entrance station at the park boundary.
- Acquire parcels or easements along Curry Canyon Road to provide public access to the east side of the mountain for future day use and camping facilities.

<u>Protect safety of automobile users and other</u> road users:

- Rehabilitate all paved roads.
- Pave selected turnouts (for use by motorists and bicyclists) to allow faster traffic to pass and for parking and vista points.
- Provide general signage at both park entrances to notify motorists of speed limits, bicyclists, and road conditions.
- Provide safety tips via radio messages during the automobile tour.

Mitigate the problems associated with the public easement along Mount Diablo Scenic Boulevard

 Rehabilitate the road to acceptable county standards through a joint funding effort with the homeowners, Athenian School, the State, and Contra Costa County. Seek an agreement with the Diablo homeowners and Athenian School to turn Mt. Diablo Scenic Blvd. over to the county. A yearly county maintenance program could then be established for the road.

Land acquisition

- Concentrate large-scale acquisition to the east and southeast of the park as funded under the California Wildlife, Coastal and Park Land Conservation Act of 1988 (Proposition 70), however, also acquire inholdings and other needed perimeter parcels as they become available.
- Work with Contra Costa County to complete open space dedications, e.g. Black Hills, Athenian School, Blackhawk, and to plan for dedications from future developments in Danville, San Ramon Valley, and other areas adjacent to the park.

(Please note that these recommendations were prepared for long-range planning purposes and does not imply a land acquisition commitment.)

WHAT HAPPENS NEXT...

This newsletter highlights portions of the draft Land Use Element and Facilities Element of the General Plan.

At the January 25 meeting, the planning team will present the single plan to be included in the Land Use Element and Facilities Element of the draft General Plan. The purpose of the meeting is to hear public comment on this plan before completing the written draft General Plan (which will be printed for public distribution, review and comment in mid-May).

If you would like to review the preliminary draft Land Use Element and Facilities Element, it will be available January 18 at the Diablo District Office, 4180 Treat Boulevard, Suite D, Concord. The telephone number is 687-1800.

If you have questions or comments, please send them to:

Mount Diablo State Park
General Planning Team
Dept. of Parks and Recreation
P.O. Box 942896
Sacramento. CA 94296-0001

newsletter

General Plan Update Issue Number 8

Nount Diablo State Park

July 1989

The Preliminary General Plan Has Been Completed!

The California Department of Parks and Recreation has completed a preliminary general Plan and environmental impact report for Mount Diablo State Park. Copies of the documents are available for your review at the following locations:

Contra Costa County Public Libraries

Central Library 1750 Oak Park Boulevard Pleasant Hill 944-3434

Concord Branch Library 2900 Saivio Street Concord 671-4455

San Ramon Valley Branch Library 555 South Hartz Avenue Danville 837-4889

Walnut Creek Branch Library 1644 Broadway Walnut Creek 934-5373

Local Government Agencies

Contra Costa County
Community Development
651 Pine Street, 4th Floor, Northwing
Martinez
646-2035

City of Wainut Creek Community Services 1666 North Main Street Walnut Creek 943-5867

City of Concord Planning Department 1950 Parkside Drive Concord 671-3044

City of Clayton Planning Department 1007 Oak Street Clayton 672-3622 City of Danville Planning Department 510 La Gonda Way Danville 820-1080

<u>State Department of Park</u> <u>and Recreation Offices</u>

Diablo District Office 4180 Treat Blvd., Suite D Concord

Mount Diablo SP Office Junction of North Gate and South Gate Roads Mount Diablo State Park

Development Division 1416 9th Street, Room 902 Sacramento

Central Coast Region 2211 Garden Highway Monterey

Any questions or comments should be directed to:

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Please complete your review of the preliminary general plan and return your comments to Mr. Doyle no later than <u>September 11. 1989</u>.

The State Park and Recreation Commission hearing on the Preliminary General Plan for Mount Diablo State Park is scheduled for November 1989. You will be notified of the date, time, and location of the hearing in newsletter #9.

DEPARTMENT OF PARKS AND RECREATION COMMISSION

P.O. Box 942896, SACRAMENTO, CA 94296-0001



NOTICE OF HEARING ON NOVEMBER 9, 1989 CALIFORNIA STATE PARK AND RECREATION COMMISSION

NOTICE IS HEREBY GIVEN that the State Park and Recreation Commission, pursuant to authority contained in Sections 5002.3 and 5019.50 of the Public Resources Code and Sections 11370 et seq. of the Government Code and pursuant to Law, will meet on Thursday, November 9, 1989 at 9:00 a.m. at the Sheraton Hotel, 45 John Glenn Drive, Concord, CA, to take action on the proposed Mt. Diablo State Park General Plan; and proposed cultural preserve within Mt. Diablo State Park. The meeting facility is wheelchair accessible.

Copies of the General Plan will be available for review at the Department of Parks and Recreation's regional offices at 396 Tesconi Court, Santa Rosa; 2211 Garden Road, Monterey; 730 South Beckman Road, Suite A, Lodi; 1333 Camino Del Rio South, Suite 200, San Diego; the Diablo District, 4180 Treat Boulevard, Suite D, Concord; the Concord Library, 2900 Salvio Street, Concord; and the Department's Headquarters, 1416 Ninth Street, Sacramento.

NOTICE IS GIVEN that any person may file a written statement on the above proposed actions by writing to the undersigned, or by presenting oral or written statements or arguments at the hearing at 10:00 a.m., or as soon thereafter as the matter may be heard. Inquiries may be directed to Lorraine Anderson, (916) 324-6976, or the Department of Parks and Recreation, P. O. Box 942896. Sacramento, CA 94296-0001.

NOTICE IS ALSO GIVEN that the Commission will tour Mt. Diablo State Park and vicinity on November 7 and 8, 1989. No action will be taken by the Commission on these tours.

SO ORDERED;

Henry R. Agonia, Secretary State Park and Recreation Commission

rewsletter

Update
Issue Number 9

ount Diablo State Park

January 1990

Public Informational Meeting

The meeting will be held:

January 18, 1990 (Thursday), 7pm-8:30 pm

City of Concord

City Council Chambers

1950 Parkside Drive

Concord

Park staff will be presenting highlights and answering questions regarding the approved Wildfire Management Plan. Questions regarding the final General Plan for Mount Diablo State Park will not be discussed at this meeting.

Commission Action

On November 9, 1989, the California State Park and Recreation Commission approved the General Plan for Mount Diablo State Park. The Commission also directed the department to hold a public informational meeting to explain the highlights of the Wildfire Management Plan which is part of the General Plan.

Summary of the Wildfire Management Plan

The Wildfire Management Plan (WMP) provides for better control of wildfires in the area. The department worked cooperatively with the California Department of Forestry and Fire Protection and with local fire districts to develop this plan. The Contra Costa County Board of Supervisors also supported the WMP.

State and local fire experts believe that this plan provides for improved and more comprehensive fire protection than that which currently exists for the park and adjacent properties. This plan will protect the park from fires originating outside the unit as well as protecting adjacent residences by providing containment of fires originating in the park.

The plan uses a combination of discing, grading, and brush removal to create fire breaks around the parks perimeter. Throughout the interior of the park, additional fuelbreaks will be created around structures and facilities, and in grassland, shrubland, woodland, and forest. Controlled burns will continue to be used periodically to help reduce fuel loads.

The WMP also clarifies the roles of the various fire-fighting agencies, which will provide for better coordination between agencies resulting in more efficient management of fire-fighting resources during fire emergencies.

Meeting Agenda

Park staff will present a slide show to help explain the WMP program, discuss technical aspects of the plan, and answer questions. Questions regarding the Mount Diablo State Park General Plan will be referred to the General Planning Team in Sacramento.

Appendix B: Glossary of Terms

State	State park system facilities		
Graphic symbol	Facility - description/components	Activity/purpose	
•	Entry road		
₹,	Vehicle access point.	Public vehicular access.	
5	Disabled access		
C.	Turn around, limited parking.	Closed to private vehicles except for disabled visitor access.	
	Rest area	,	
	Parking, restroom.	Roadside rest area for travelers.	
6	Contact station	·	
	Small structure, entry gates, park informa- tion display, telephone, electricity, staff restroom, storage area.	Fee collection, public information and safety, and control of park access.	
	Ranger station		
ia	Structure for office, staff meeting area, park information display, dispatch radio, public telephone, restroom, staff shower. Structure(s) for maintenance shop, equipment and material storage (optional, may be located separately). Structure(s) or trailer pad(s) for employee housing (optional, may be located separately), utilities.	Park administration, information, maintenannce, public safety, storage of equipment and materials, employee living area.	
	Service area Structure(s) for maintenance shop, equipment and material storage (when located separately from ranger station), utilities.	Park maintenance, storage of equipment and materials.	
	Employee housing area Structure(s) or trailer pad(s) for employee housing (when located separately from ranger station), utilities.	Employee living area.	
	Visitor center Structure for collections, interpretive displays, meeting area, theater, library, shop, docent headquarters, restroom, utilities.	Public information and education, artifact and speciment preservation and storage, docent training and activities, sale of environmental information and documents.	

Graphi symbo		Activity/purpose
	Restroom Portable toilet or pit toilet or comfort station or combination building. Utilities as required.	Sanitation
P	Parking Paved or unpaved vehicle parking area. The number of spaces is as indicated on plan.	Vehicle parking.
1	Family picnic area The number of units is as indicated on the plan. Each unit contains a parking space, a picnic table, and a BBQ. Each group of units contains a water supply point, a refuse collection point, a restroom.	Family picnicking, day-use activities.
	Scenic overlook Bench, locator map, interpretive exhibit (optional).	Rest stop, public information.
E.	Cultural heritage point of interest Human activity site, interpretive exhibit (optional).	Preservation, interpretation.
Á.	Trailhead Parking, restroom, picnic tables, refuse collection point, water supply point (optional), interpretive display (optional), locator map.	Walking and hiking starting point, public information.
K	Hiking trail Unpaved with varying lengths and degrees of difficulty, loop opportunities, rest stops with picnic tables.	Walking, hiking, jogging.

Appendix C

INITIAL STUDY CHECK	(1	157	٣
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	:		ONEOREION		State Clearinghouse #	
1.	ВАС	CKGROUN	D INFORMATION			
	A.	Name of	Project:	Mount Diablo State Park	General Plan	
		a a				· · · ·
			Date: <u>3 / 6</u>			
	C.				vironmental Review Section	
				324-6421		votem unite
	D۳	Purpose:_	The genera	i plan quides development	and operation of State Park Sy	/scen uncs.
	E.	Location:	Central Co	ntra Costa County		
	F.	Descriptio	n: <u>The gener</u>	al plan will describe and	propose policies for natural a	and
		culti	ral resource	s, interpretation, conces	sions, operations, land use and	<u>a</u>
		<u>faci</u>	Lities.			
				,		
				<u>,,</u>		
	5					
	G.	Persona	and Organiz	ations Contacted:		
				ict Superintendent, Mt. D	viablo District	
				m, Cal. Dept. Parks and R		
		•		y Regional Parks District		<u> </u>
li	. EN	IVIRONME	NTAL IMPACTS.	(Explain all "yes" and "maybe" answ	vers)	
	A.		ill the proposal res			Yes Maybe No
					?	
		. `	•		e soil?	
			· -			
					ogic or physical features?	
					the site?	
-		modif	y the channel of a	river or stream or the bed of the ocean	in siltation, deposition or erosion which may n or any bay, inlet, or lake?	•
		7. Expos	sure of all people of a contract of a contra	or property to geologic hazards such	as earthquakes, landslides, mudslides, ground	

В.	Air. Will the proposal result in:	Yes	Mayb	e No
	1. Substantial air emmissions or deterioration of ambient air quality?			V
	2. The creation of objectionable odors?		$\overline{\Box}$	F
	3. Alteration of air movement, moisture or temperature, or any change in climate, either locally or regionally?.	$\overline{\Box}$	$\overline{\Box}$	
C.	Water. Will the proposal result in:	_		 -
	1. Changes in the currents, or the course or direction of water movements, in either marine or fresh waters?			1
	2. Changes in absorption rates, drainage patterns, or the rate and amount of surface water runoff?			$\overline{\Box}$
	3. Alterations to the course or flow of flood waters?		$\overline{\Box}$	
	4. Change in the amount of surface water in any water body?	$\overline{\Box}$		
	5. Discharge into surface waters, or in any alteration of surface water quality, including but not limited to temperature, dissolved cxygen or turbidity?			
	6. Alteration of the direct on or rate of flow of ground waters?			سما
	7. Change in the quantity of ground waters, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations?			
	8. Substantial reduction in the amount of water otherwise available for public water supplies?			-
	9. Exposure of people or property to water-related hazards such as flooding or tidal waves?			
	10. Significant changes in the temperature, flow or chemical content of surface thermal springs?			-
D.	Plant Life. Will the proposal result in:			
	1. Change in the diversity of species, or number of any species of plants (including trees, shrubs, grass, crops, and aquatic plants)?		Y	
	2. Reduction of the numbers of any unique, rare or endangered species of plants7			سيغ
	3. Introduction of new species of plants into an area, or in a barrier to the normal replenishment of existing species?			سن
	4. Reduction in acreage of any agricultural crop?		;	lum
E.	Animal Life. Will the proposal result in:			
	1. Change in the diversity of species, or numbers of any species of animals (birds, land animals including reptiles, fish and sheilfish, benthic organisms, or insects)?			
	2. Reduction of the numbers of any unique, rare or endangered species of animals?			
	3. Introduction of new species of animals into an area, or result in a barrier to the migration or movement of animals?			
	4. Deterioration to existing fish or wildlife habitat?			
F.	Noise. Will the proposal result in:			
	1. Increase in existing noise levels?			
	2. Exposure of people to severe noise levels?			
G.	Light and Glare. Will the proposal result in:			
	1. The production of new light or glare?		V	
H.	Land Use. Will the proposal result in:			
	1. A substantial alteration of the present or planned land use of an area?			<u>~</u>
l.	Natural Resources. Will the proposal result in:			
	1. Increase in the rate of use of any natural resources?			
	2. Substantial depletion of any nonrenewable resources?		$\overline{}$	V

J.	Risk of Upset. Does the proposal result in:	V.	86 m. 16.	. •
	1. A risk of an explosion or the release of hazardous substances (including, but not limited to, oil, pesticides, chemicals, or radiation) in the event of an accident or upset conditions?	Yes	Mayb	e No
,	2. Possible interference with emergency response plan or an emergency evacuation plan?			
K.	Population. Will the proposal result in:			
	1. The alteration, distribution, density, or growth rate of the human population of the area?			V
L.	Housing. Will the proposal result in:			
	1. Affecting existing housing, or create a demand for additional housing?			
M.	Transportation/Circulation. Will the proposal result in:			
	1. Generation of substantial additional vehicular movement?			V
	2. Affecting existing parking facilities, or create a demand for new parking?			V
	3. Substantial impact upon existing transportation systems?			V
	4. Alterations to present patterns of circulation or movement of people and/or goods?			
	5. Alterations to waterborne, rail, or air traffic?			V
	6. Increase in traffic hazards to motor vehicles, bicyclists, or pedestrians?			
N.	Public Services. Will the proposal have an effect upon, or result in a need for new or altered governmental services in any of the following areas:			
	1. Fire protection?		V	
	2. Police protection?			
	3. Schools?			
	4. Parks and other recreational facilities?			\mathbf{Z}
	5. Maintenance of public facilities, including roads?		V	
	6. Other governmental services?			
0.	Energy. Will the proposal result in:			
	1. Use of substantial amounts of fuel or energy?			
	2. Substantial increase in demand upon existing sources of energy, or require the development of new sources?			
P.	Utilities. Will the proposal result in a need for new systems, or substantial alterations to the following utilities:			
	1. Power or natural gas?			
	2. Communication systems?			
	3. Water?			
	4. Sewer or septic tanks?			
	5. Storm water drainage?			
	6. Solid waste and disposal?			
Q.	Human Health. Will the proposal result in:			
	1. Creation of any health hazard or potential health hazard (excluding mental health)?			B
	2. Exposure of people to potential health hazards?			
R.	Aesthetics. Will the proposal result in:			
	The obstruction of any scenic vista or view open to the public, or will the proposal result in the creation of an aesthetically offensive site open to public view?			
S.	Recreation. Will the proposal result in:		•	
	1. An impact upon the quality or quantity of existing recreational opportunities?			

T.	Cultural Resources.	Yes Maybe	No
	1. Will the proposal result in the alteration of or the destruction of a prehistoric or historic archeological site?		سما
	2. Will the proposal result in adverse physical or aesthetic effects to a prehistoric or historic building, structure, or object?		
	3. Does the proposal have the potential to cause a physical change which would affect unique ethnic cultural		
	values?		1
	4. Will the proposal restrict existing religious or sacred uses within the potential impact area?		7
U.	Mandatory Findings of Significance.		
	1. Does the project have the potential to degrade the quality of the environment, reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?		구
	2. Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?		
	3. Does the project have impacts which are individually limited, but cumulatively considerable?		
	4. Does the project have environmental effects which will cause substantial adverse effects on human beings,		
	either directly or indirectly?		
DIS	CUSSION OF ENVIRONMENTAL EVALUATION (See Comments Attached)		
	•		
	·		
	•		
_	TERMINATION		
Ou.	the basis of this initial evaluation:		
}	I find the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECL be prepared.	ARATION wi	iII
	I find that although the proposed project could have a significant effect on the environment, there will not be a s in this case because the mitigation measures described on an attached sheet have been added to the project. DECLARATION will be prepared.	ignificant effec . A NEGATIV	ct E
V	I find the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IM is requied.	PACT REPOR	Т
Date	3,6,86 Roy Wellingin	<i>7</i> <	

DISCUSSION OF ENVIRONMENTAL EVALUATION

A. Earth

- 2. Construction of new campgrounds, parking lots, etc., will require some grading and fill.
- 5. New paved areas will channel runoff and could cause gully formation.
- 7 Roads, trails, picnic areas, and campgrounds in steep areas might be hit with rock falls or land slides because of earthquakes and storms.

C. Water

- See A(5) above.
- 3. Pine Pond on Pine Creek may be drained.

D. Plant Life

 Some natural vegetation will be removed for new development. If springs and wells are tapped to supply major new facilities, less water will be available for phreatic plants.

E. Animal Life.

4. If Pine Pond is drained, resident aquatic life will diminish. If springs and wells are tapped to supply major new facilities, less water will be available for animal life.

G. Light and Glare

 New parking areas and campgrounds will cause new sources of glare (cars) and light (area lighting).

M. Transportation/Circulation

Increased traffic on park roads may result in increased hazard to motorists, bicyclists, equestrians, and pedestrians.

N. Public Services

- 1. The Department of Parks and Recreation will acquire equipment, personnel and begin a new fire protection program.
- 2. The Department proposes that the County take over maintenance of Mount Diablo Scenic Blvd from the homeowners association.

P. Utilities

- 2. The general plan proposes a consolidation of telecommunications equipment in one location on Mt. Diablo.
- 3. New facilities will require either hookups to water districts or development of local water supplies.
- 4. New facilities will require hookups to wastewater districts. Otherwise holding tanks, chemical toilets, composting toilets, leach fields, or a combination of the above will be needed.

Appendix D

CONTRA COSTA COUNTY



CONSOLIDATED FIRE DISTRICT

FIRE CHIEF William F. Maxfield

2010 Geary Road Pleasant Hill, California 94523-4694

TELEPHONE (415) 930-5500

May 5, 1986

BOARD OF FIRE COMMISSIONERS Albert J. Gray Edward B. Haynes Donald J. MacIntosh B. Palmer Riedel Harold E. Wildes

Department of Parks and Recreation P.O. Box 2390 Sacramento, CA 95811

Attn: James M. Doyle Supervisor

Preliminary General Plan -- Mt. Diablo State Park

Dear Mr. Doyle:

Per your request of March 19, 1986, CCCFPD, SRVFPD, East Diablo FPD and the California Department of Forestry are responsible for fire protection and primary emergency medical care in Central Contra Costa County, including areas contiguous to the Park and within the Park.

Given the fire history in the area of the Park, a fire protection plan encompassing vegetation management, including grazing, fire road maintenance, water supply and fire suppression resources must be addressed. As Park use continues to grow along with encroachment of residential type developments, fire threat must be mitigated.

In addition, emergency medical care requests from citizens and employees continues to increase as Park use expands.

The local fire agencies must be involved in early planning processes and discussions relative to our interests and responsibilities.

The Environmental Impact Report should include at least the following elements:

- Vegetation Management Plan 1.
 - . grazing
 - prescribed burning
 - . fuel breaks
 - fuel load assessment

RECEIVED

MAY 1 3 1986

2. Fire	Suppression	and	Prevention	Plan
---------	-------------	-----	------------	------

- . pre-attack planning
- . identification of suppression resources
- . access to park
- . fire road planning and maintenance
- . staffing, training and equipment of Mt. Diablo State Park
- 3. Risk Assessment and Analysis
- 4. Rescue and Emergency Medical Care
- 5. Evacuation and Refuge Areas

Date

6. Fire Impact on Adjoining Development

William F. Mollett
Contra Costa County Fire Protection District
Ohn O. Chay
East Diablo Fire Protection District
melan E. Deardall
San Ramon Valley Fire Proteotion District
Jean Rodgers, Battalion Chief (1).
California Department of Forestry
May 8, 1986

Appendix E:

State Park Noise Regulations

4320. Peace and Quiet

To insure peace and adequate rest for visitors, no person shall so conduct himself that he distrubs other in sleeping quarters or in campgrounds between the hours of 10PM and 6AM daily. No person shall, at any time, use outside electronic equipment including electrical speakers, radios, phonographs, televisions, or other machinery, at a volume which emits sound beyond the immediate individual camp or picnic site without specific permission of the department. Engine drive electric generators which emit sound beyond the limits of a camp or picnic site may be operated only between the hours of 10AM and 8PM. (Authority cited: Public Resources Code Section 5003.)

APPENDIX F

THE GENERAL PLAN TEAM

This report was prepared by:

Stuart Hong, Associate Landscape Architect; Gary Fregien, Senior Resource Ecologist; Robert Hare, State Park Interpreter II; Deborah Hillyard, Senior Resource Ecologist; Carol Roland, State Park Historian I; Roger Willmarth, Park and Recreation Specialist; Mary Ann Burford, Staff Services Analyst; Felix Arteaga, District Superintendent, Diablo District; Robert Todd, Chief Ranger; Tom Bernardo, State Park Ranger II; William Beat, District Superintendent, Klamath District.

Under the supervision of:

James Quayle, Senior Landscape Architect, Development Division
Kerry Gates, Supervising Landscape Architect, Development Division
David B. Schaub, Supervising Resource Ecologist, Resource Protection Division
Wayne Woodroof, Manager, General Plans and Policy Development
Robert D. Cates, Chief, Development Division
Richard G. Rayburn, Chief, Resource Protection Division
Keith L. Demetrak, Chief, Office of Interpretive Services

With thanks to:

The many citizens who have helped shape this plan through participation in the planning at workshops and meetings, especially Jim Cutler, Chuck Gabrislak, Robert Doyle, Elizabeth Patterson, and members of the Mount Diablo Interpretive Association and Save Mount Diablo.

Appendix G

Copies of the Mount Diablo State Park Wildfire Management Plan are available for your review at the following locations:

Contra Costa County Public Libraries:

- Contra Costa County Central Library 1750 Oak Park Boulevard Pleasant Hill
- Concord Branch Library 2900 Salvio Street Concord
- San Ramon Valley Branch Library 555 South Hartz Avenue Danville
- Walnut Creek Branch Library 1644 Broadway Walnut Creek

State of California Department of Parks and Recreation:

 Diablo District Office 4180 Treat Boulevard, Suite D Concord

Local Fire Protection Districts:

- Contra Costa County
 Consolidated Fire District
 2010 Geary Road
 Pleasant Hill
- Eastern Diablo Fire Protection District 745 First Street Brentwood
- San Ramon Valley Fire Protection
 District
 800 San Ramon Valley Road
 Danville
- California Department of Forestry and Fire Protection
 11851 Marsh Creek Road Clayton

Mount Diablo State Park

References

227	Resource Element Policy References
227	Natural Resources
232	Cultural Resources
232	Esthetic Resources
233	Recreation Resources
234	Selected References

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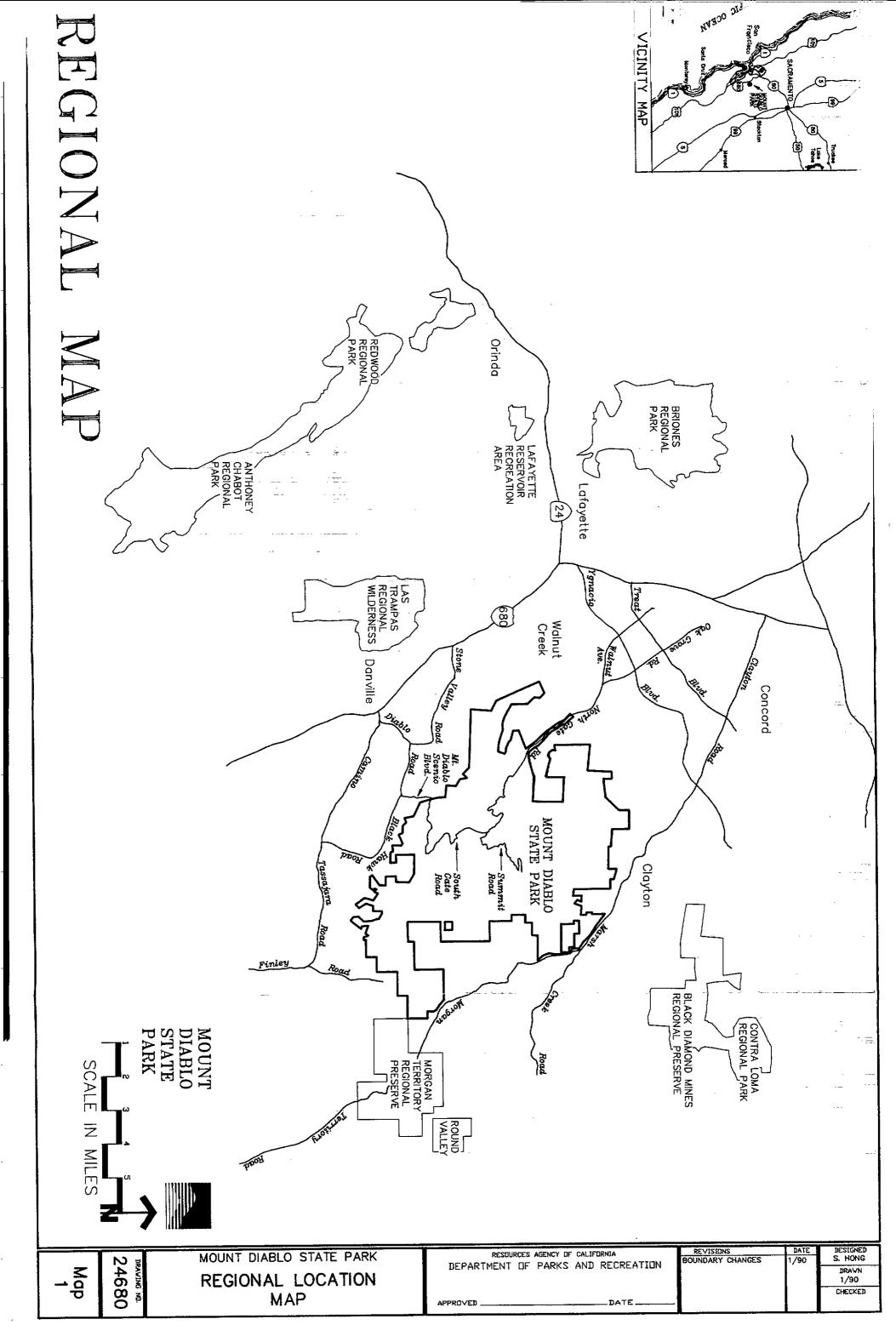
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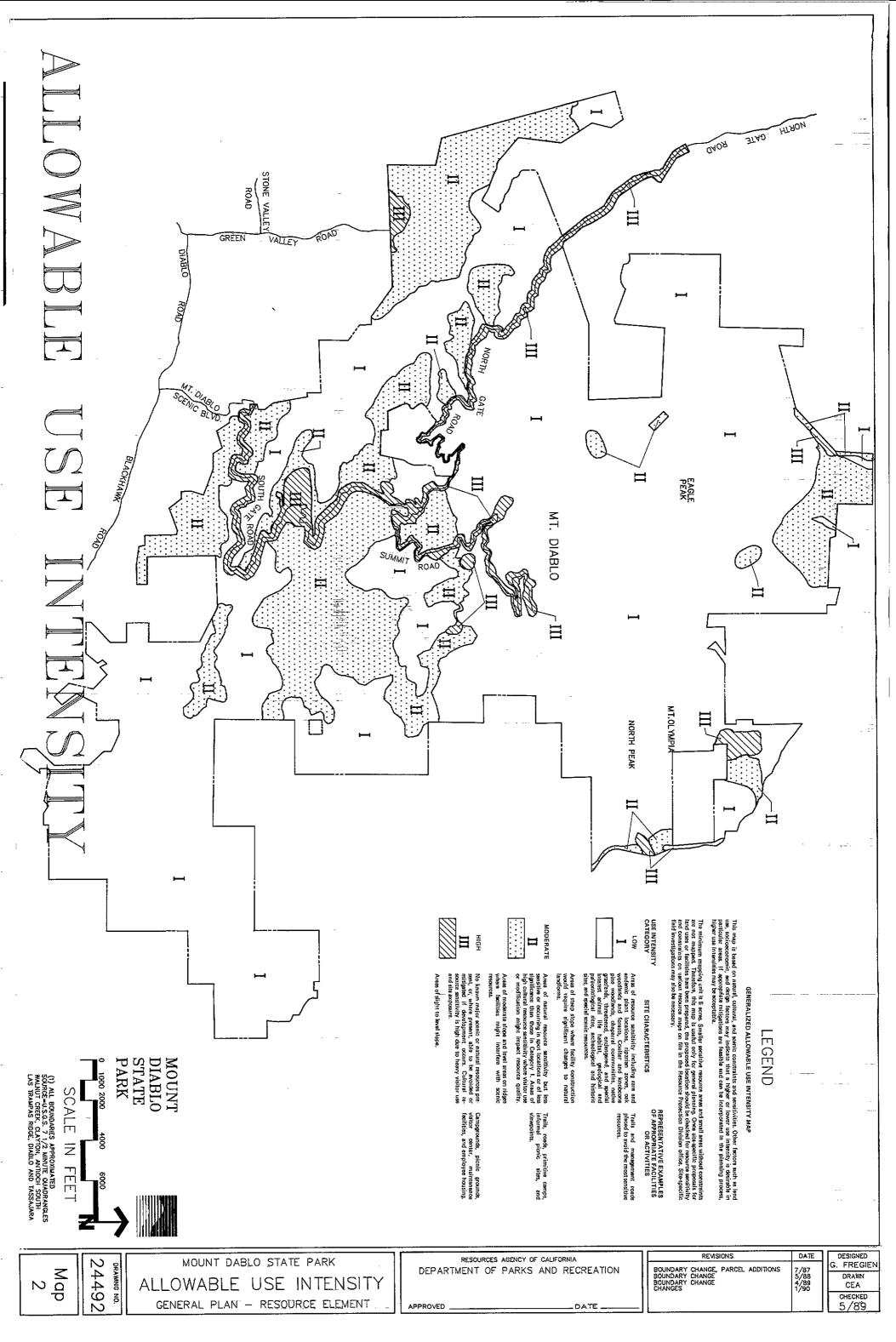
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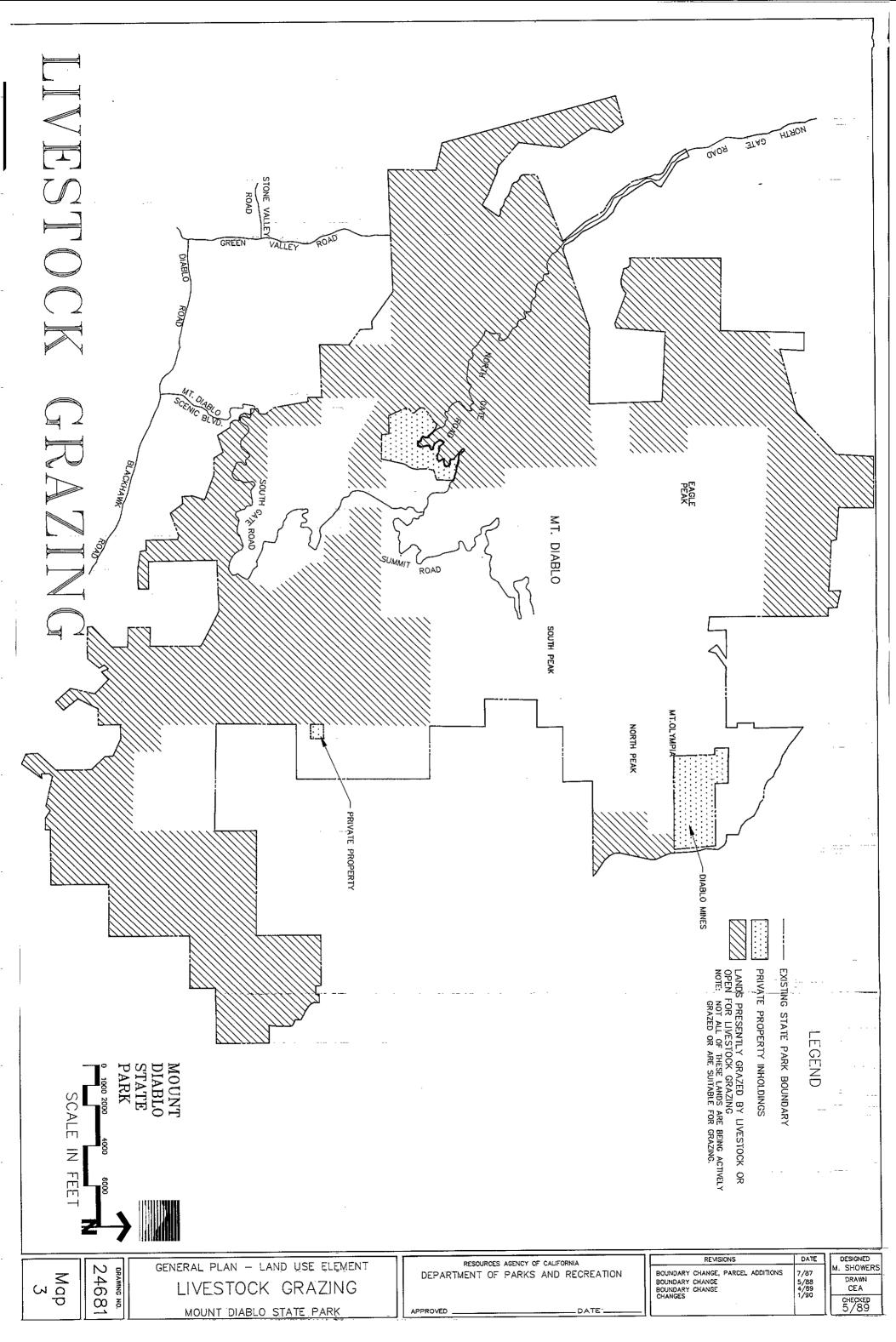
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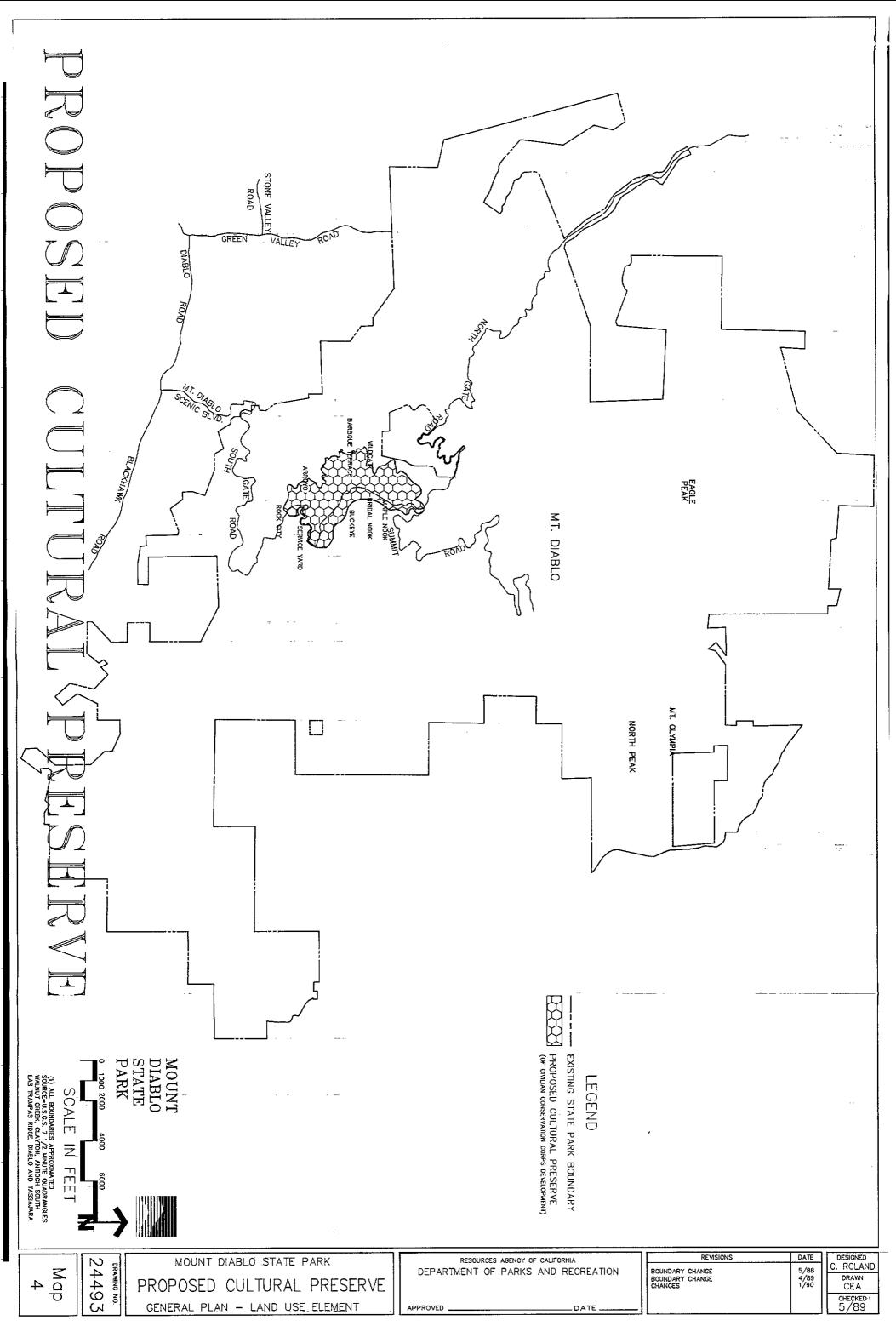
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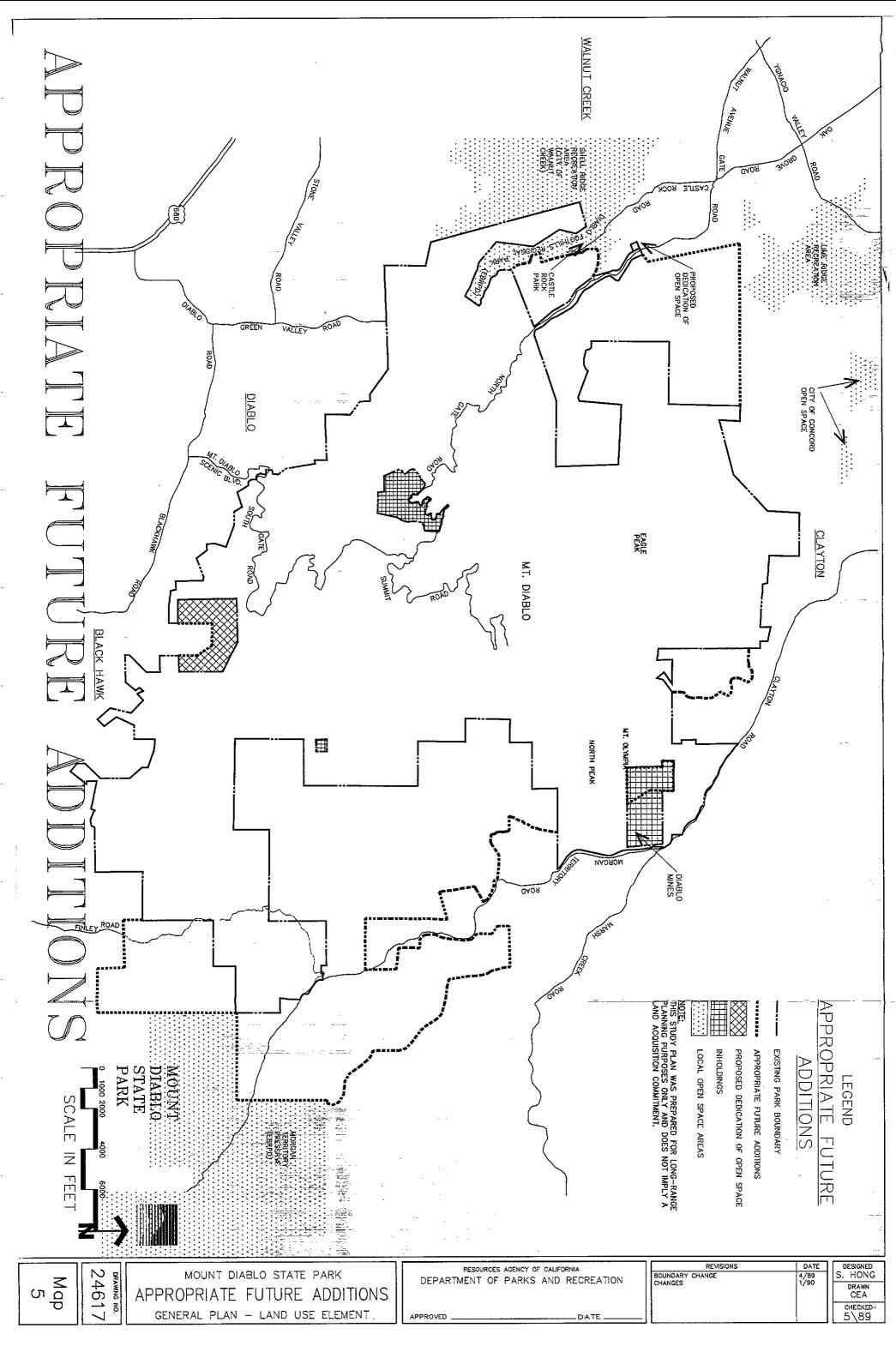
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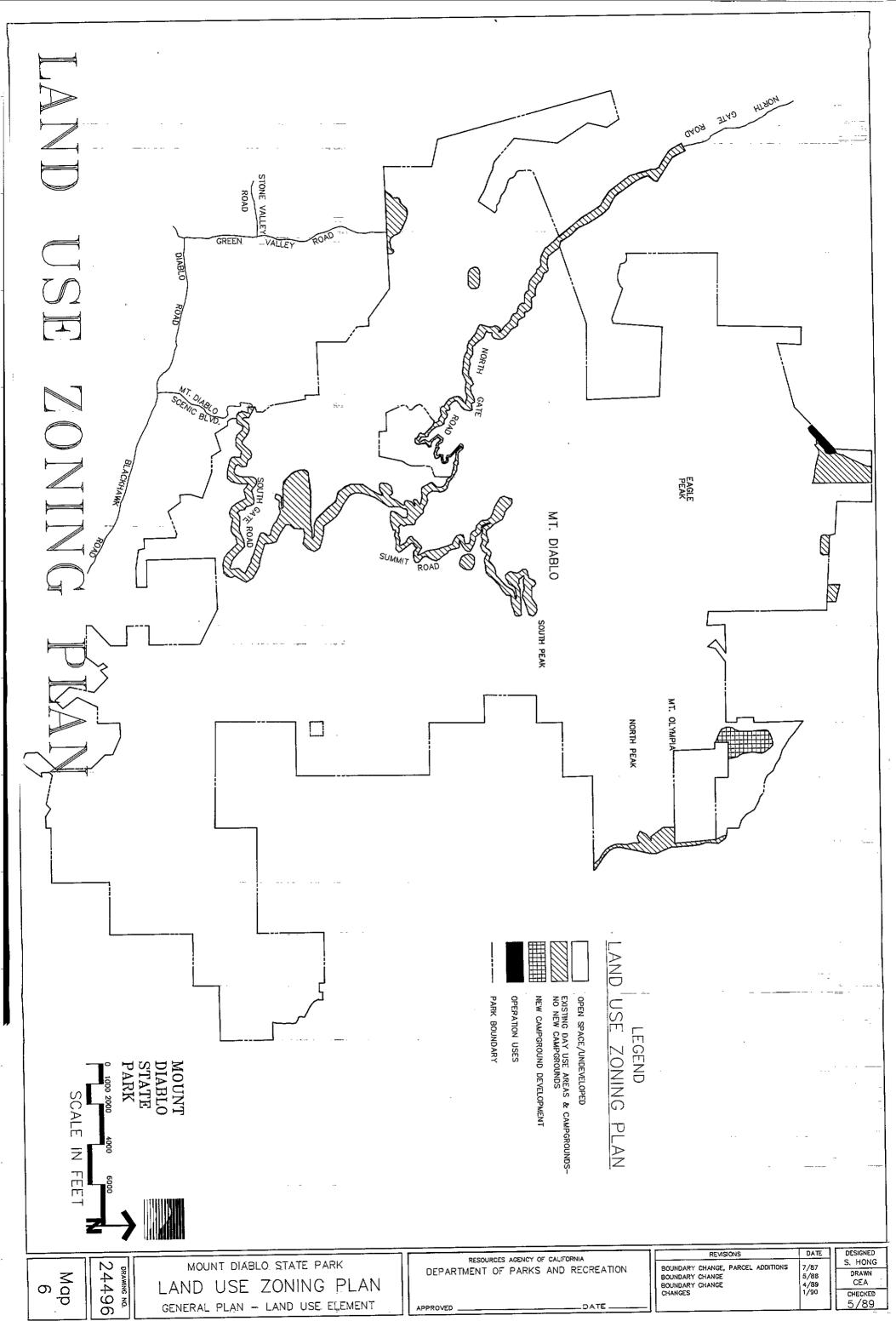


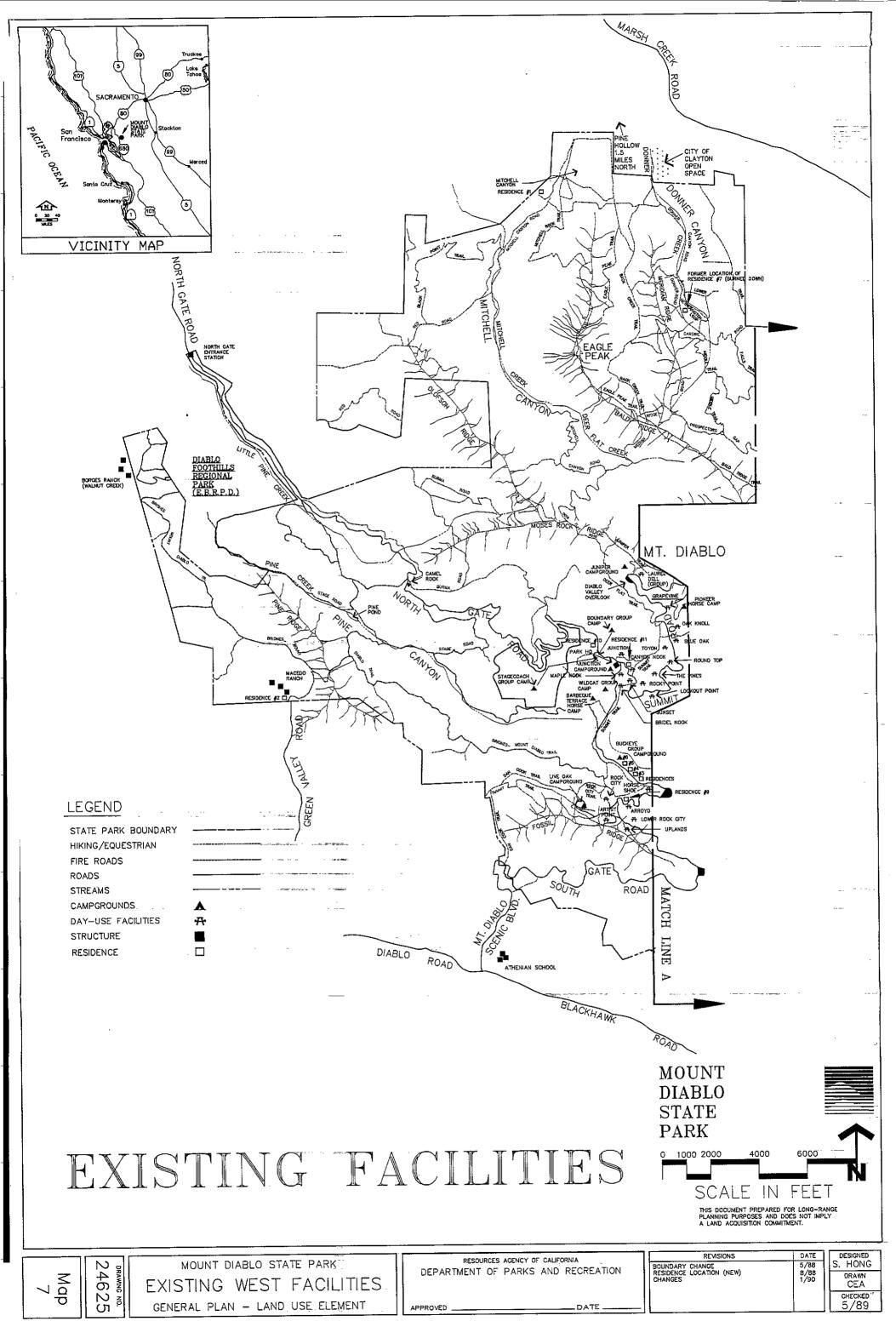


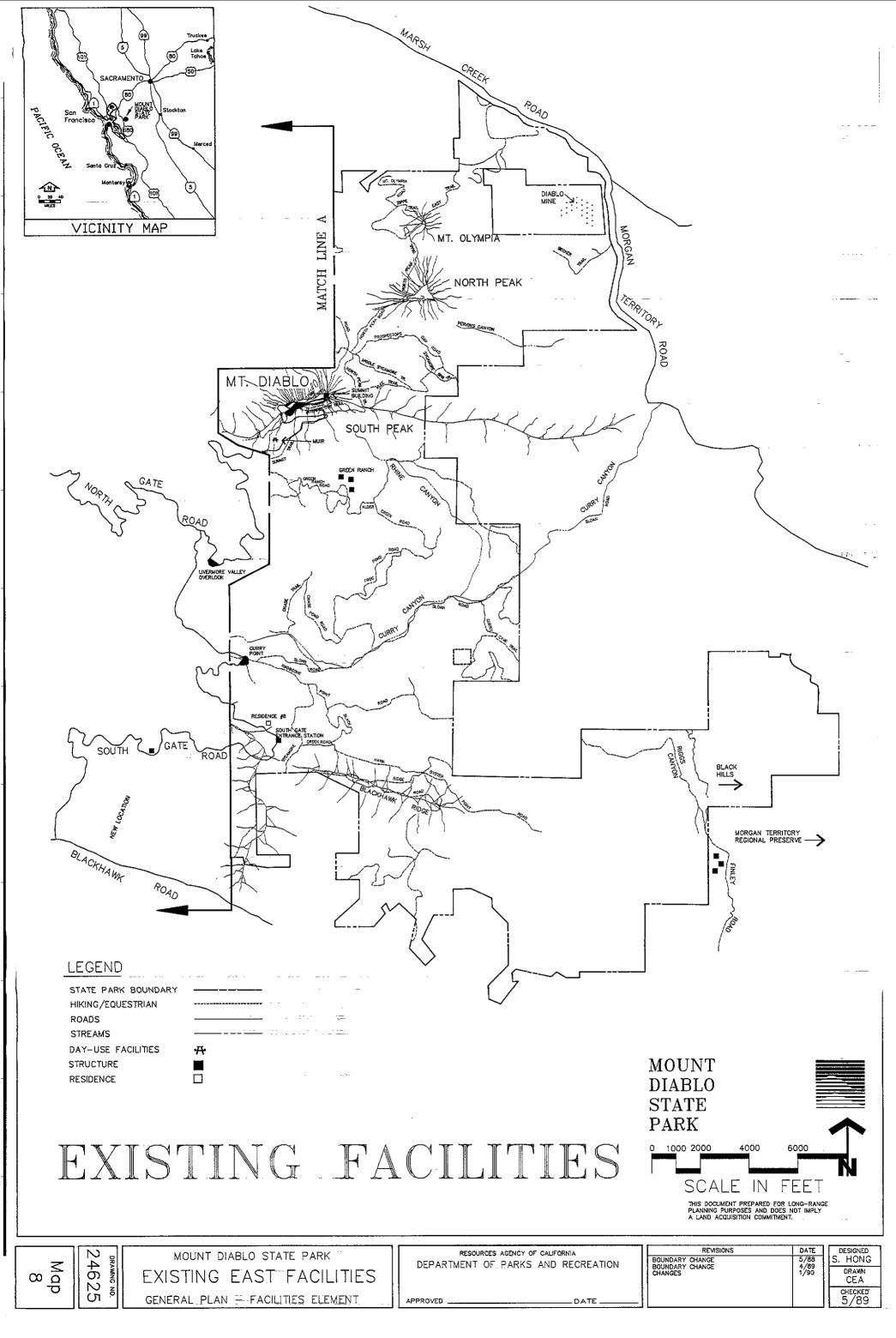


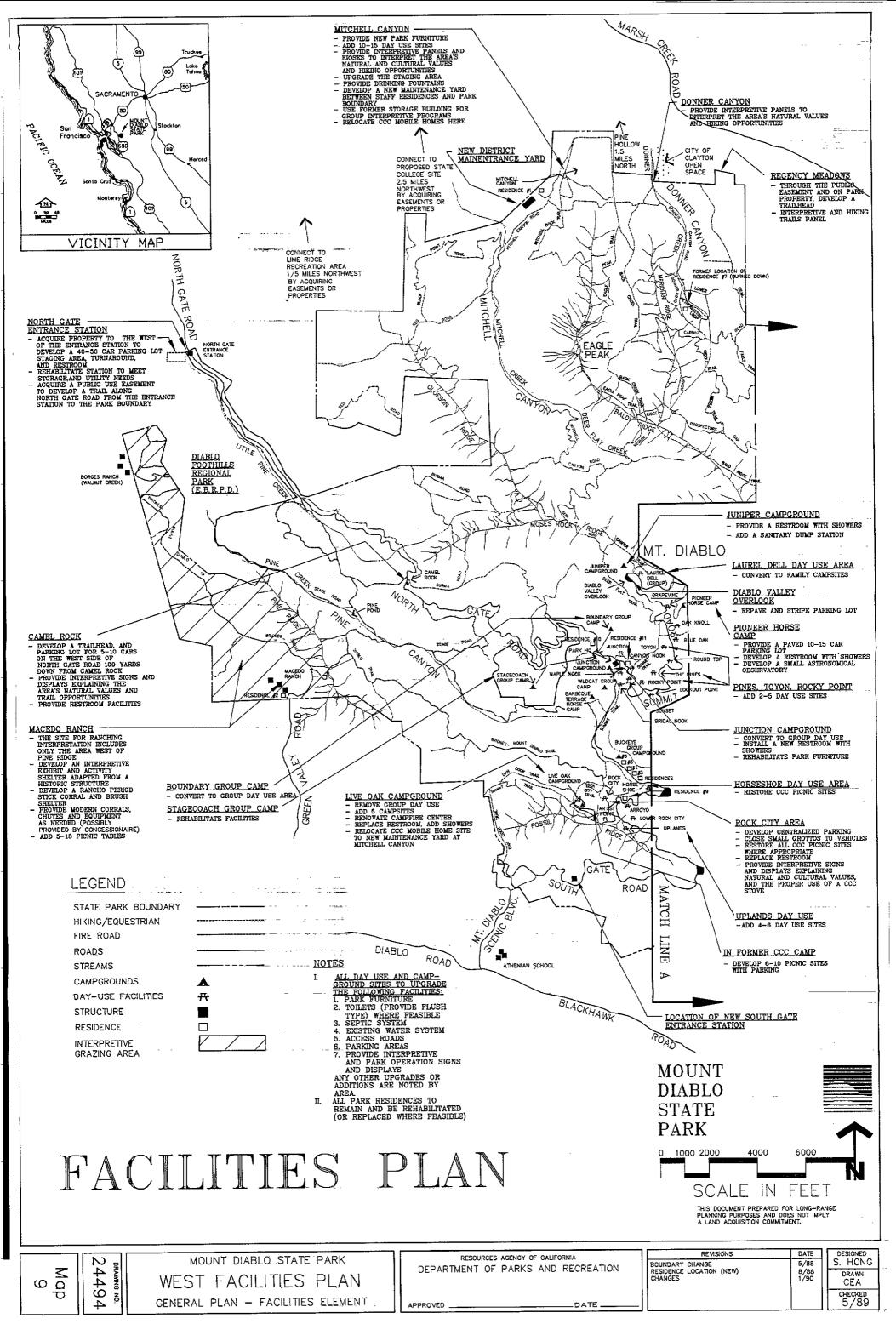


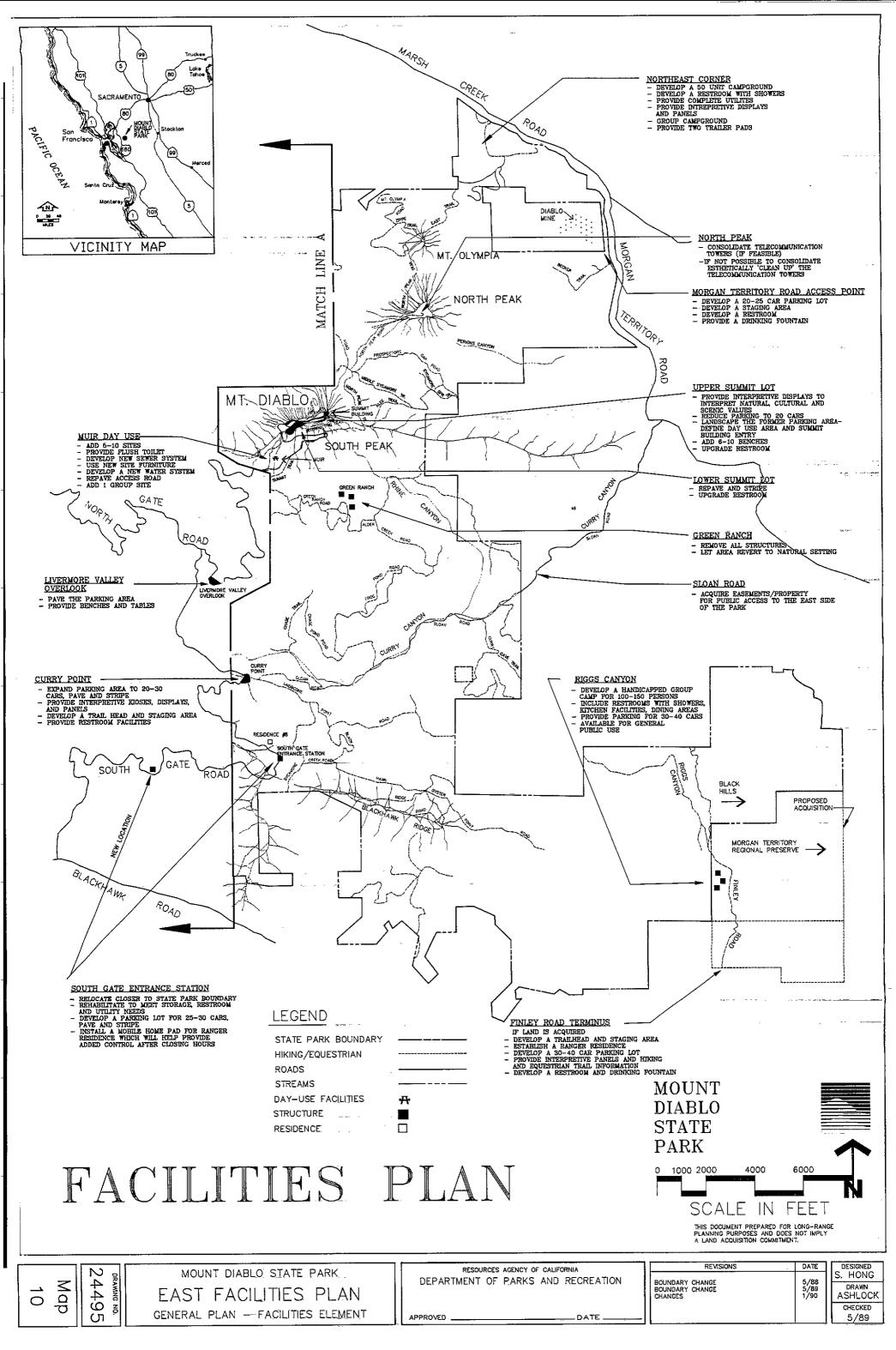














Mount Diablo State Park

General Plan

California Environmental Quality

Act - Comments and Responses

Mount Diablo State Park

California Environmental Quality Act Comments and Responses

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INTRODUCTION

The 45-day public review period for the Mount Diablo State Park General Planbegan July 26 and ended September 11, 1989.

The department received over 1,000 letters during the public review period. The cattle grazing issue dominated the comments and was the primary subject of a majority of these letters. Each person that commented was sent a letter acknowledging receipt of their comments and given notice of the time and place of the State Park and Recreation Commission public hearing on the general plan.

COMMENT LETTERS

Copies of comment letters from public agencies, organizations, and some individuals are reproduced in this section. Because of the great volume of mail, and since there are many duplicate comments made in these letters, individual responses to each letter was not made. All letters from agencies and organizations are reproduced in the FEIR, as are copies of form letters that were received. Letters from individuals, however, are not reproduced unless they address general plan/EIR issues not previously discussed in other letters. The department's responses to the comments made on the general plan are in the section following.

Sample form letters are enclosed. These form letters represent the majority of comments received.

The following list is of letters reproduced in this section:

Letters Addressing Mostly Non-Grazing-Related Issues

Caltrans - District 4
Town of Danville
Professional Foresters Registration
Save Mount Diablo
Bicycle Trails Council of the East Bay
California Native Plant Society, San Francisco Bay Chapter
Sierra Club, San Francisco Bay Chapter
California Parks and Conservation Association
Mary L. Bowerman
Mark J. Palmer
William and Genevieve Sattler
Jack Wessman
Sadie Emmerman

Letters Addressing Grazing-Related Issues

Form Letters "A" to "G" California Department of Forestry Alameda County Resource Conservation District USDA Soil Conservation Service (Richard King) USDA Soil Conservation Service (Joel Brown) U.C. Cooperative Extension (Theodore Adams, Jr.) U.C. Cooperative Extension, Alameda County (Larry Forero) Contra Costa Resource Conservation District Diablo Ranch (Tom Brumleve) California State Horsemen's Association San Ramon Valley Horsemen's Association Diablo Property Owner's Association Contra Costa County Citizens Land Alliance Alameda County Farm Bureau Heritage Trails . California Farm Bureau Federation (Bob Vice) California Farm Bureau Federation (Grover Roberts) Contra Costa County Farm Bureau California Cattleman's Association Contra Costa County Board of Supervisors (Robert Schroder) Fall River - Big Valley Cattleman's Association Alameda County Cattle Women Clyde Robin Seed Company, Inc. Planning and Conservation League Sierra Club, California Defenders of Wildlife California State Park Rangers Association Mt. Diablo Audubon Society Sierra Club, Santa Lucia Chapter People for Preservation of the Natural & Wild in Bay Area Open Space Livermore Amador Valley Garden Club W. G. Morgan Winslow Briggs

OFFICE OF PLANNING AND RESEARCH

1400 TENTH STREET SACRAMENTO, CA 95814

September 11, 1989

J.M. Doyle
Department of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001

Subject:

Mount Diablo State Park General Plan

SCH# 86032517

Dear: Mr. Doyle:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code requires that:

"a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Loreen McMahon or Marilyn Nishikawa at 916/445-0613 if you have any questions regarding the environmental review process.

Sincerely,

David C. Nunenkamp

Chief

Enclosures

Office of Permit Assistance

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265 RPD

cc: Resources Agency

Mount Diablo State Park

Comments Regarding Non-Grazing Issues

To

4/11

Memorandum

Loreen McMahon State Clearinghouse 1400 10th Street, Rm. 121 Sacramento, CA 95814

Date : August 7, 1989

File No.: CC-680-PM-14.85 SCH# 86032517 · CC680157

From : DEPARTMENT OF TRANSPORTATION - District 4

Subject: RE: DRAFT ENVIRONMENTAL IMPACT REPORT: MOUNT DIABLO STATE PARK (18,000 ACRES)

The State of California Department of Transportation (Caltrans) has reviewed the above-mentioned document and has the following comments:

The California Environmental Quality Act requires that all project generated impacts and identified mitigation measures be presented in the Environmental Impact Report (EIR). traffic generated by this project is not expected to have a significant impact on regular week day traffic; week-end and holiday traffic may be adversely affected. The Preliminary General Plan states that visitor attendance at Mount Diablo State Park has increased from 250,000 in 1978 to more than 500,000 in 1988, yet potential traffic impacts are not addressed in the environmental document.

A Traffic Analysis should be incorporated into the Final General Plan assessing traffic impacts in terms of the following conditions:

- Week-end and holiday volumes for Interstate 680, State a) Route 24, and for all adversely affected streets, highways, freeway ramps, crossroads and controlling intersections for existing and future traffic.
- Trip generation, distribution and assignment; including b) the methodology employed to calculate percentages and assignments.
- Future conditions with project traffic, and with · C) cumulative traffic generated by projects approved for recreational use in the area. Coverage should include all traffic that would affect the facilities evaluated.
- Mitigations that consider highway and non-highway d) improvements and services. Special attention should be given to the development of alternative solutions to circulation problems which do not rely on increased highway construction.

CC680157 Page 2 August 7, 1989

e) All mitigation measures being proposed should be fully discussed in the environmental document. Those discussions should include but not be limited to the following areas:

Financing Scheduling considerations Implementation responsibilities. Monitoring

f) Description of existing and proposed public transportation system in the project area. The information provided should include but not be limited to the types of systems, their routes, frequency and capacity.

We appreciate the opportunity to work with you on this project and wish to continue close correspondence on it. We look forward to reviewing the additional information requested in this response letter, prior to finalization of the environmental document. We expect to receive a copy of the Final General Plan from the State Clearinghouse. However, to expedite the review process, you may send two advance copies to the undersigned contact person, at the following address:

Gary F. Adams
District CEQA Coordinator
Caltrans District 4
P. O. Box 7310
San Francisco, CA 94120

Should you have any questions regarding these comments, please contact Rhoda Simmons of my staff at (415) 557-2495.

GARY F. ADAMS

District CEQA Coordinator

cc: Susan Pultz - MTC Sally Germain - ABAG

4050 Poplar Avenue Concord, CA 94521 August 5, 1989

James M. Doyle, Supervisor Environmental Review Section California Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

First, we would like to compliment the Mount Diablo State Park General Planning Team for a very comprehensive Preliminary General Plan. It has taken four years of work, study and public hearings to prepare this document. Mount Diablo is complex and diverse.

We realize that this plan is to guide the use and protection of our park over a twenty year period. The implementation of the proposals will occur over this period.

It is interesting (page 34) that Mount Diablo State Park was ranked first as the most suitable site to preserve as an example of the Sierra Foothill and Low Coastal Mountain Landscape Province (State Parks and Recreation Statewide Landscape Preservation Study, 1973). This gives credence to the strong protection of the natural resources. The historical information (pages 37-41) provide a good background about our "island mountain." We hope that we can preserve the Mount Diablo landscape both for ourselves and future generations.

Specific comments and questions follow:

Page 6 - Minor Project Recommendations

Is a short-range radio transmitter to broadcast park information and interpretation necessary? Wouldn't "canned" information detract from the individual's desire to study and enjoy Mount Diablo on his/her own? Wouldn't proposed interpretive and information panels invite more vandalism? We hope this interpretive effort will not be overdone. We support the geology auto tour when adequate pull-outs are available.

Page 6 - Facilities

The Upper Summit Lot - A few benches (no picnic tables)
would be nice, but we question planting shade trees and a "more defined landscape entry to the historic Summit Building." The present trees and vegetation are naturally occurring plants.
Would any planting be of the Mount Diablo gene pool?

Page 8 - New Additions: Mitchell Canyon

We have been assured that the new district maintenance
yard will be in the same area as the present ranger housing
and facilities. The meadow area (flat land) on the east of
Mitchell Canyon Road must be kept unencumbered. This area was
acquired to provide an unobstructed view or "window" of the
Mount Diablo peaks.

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Page 9 - Operations

We whole-heartedly agree with these statements. The State must provide staff and equipment to meet the growing needs of Mount Diablo State Park.

Page 42 - Recreation Resources

Certain areas of Mount Diablo State Park should be classified as a "wilderness area." We have urged that the communication facilities study of North Peak be completed and the facilities consolidated and moved to the South Peak. Then the north side of the mountain (from Mitchell Canyon eastward) could be classified as a wilderness area. Also the Inner Black Hills, Sycamore Canyon, Alamo Canyon, Oyster Point and eastward could comprise a second wilderness area or a natural preserve.

- Page 47 <u>Declaration of Purpose</u>
 We urge that this declaration be approved.
- Page 47 Zone of Primary Interest

 We agree with these statements. We maintain that adjoining developments have a responsibility to provide and maintain a buffer zone for protection against wildfire. It should not be the sole responsibility of the State Park to protect the developments.
- Page 48 General Hydrologic Resources
 We support the policy statement to protect these resources.
- Page 51 Plant Resources and Page 52 Riparian Woodland Zone Management

We agree with the policy to restore and manage the plant resources. Our concerns include the removal of poison hemlock (Conium maculatum L.) and periwinkle (Vinca major) in Mitchell Canyon (page 52). The poison hemlock has taken over the old reservoir site in lower Mitchell Canyon and is spreading up the canyon. We are also concerned about the areas of yellow star thistle (Centaurea solstitialis L.). Management should encourage the spread of perennial native grasses in place of introduced species.

- Page 53 Grassland Management
 We agree with the restoration policy which is partially addressed in the above statement.
- Page 53 Oak Woodland and Forest Management
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 We support the preservation of the Rock Society plants.

4050 Poplar Avenue Concord, CA 94521 August 5, 1989

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- Page 55 Fire Prevention and Suppression

 We support the Wildfire Management Plan which divides the park into compartments so that fire suppression activities can be concentrated along existing natural and artificial firebreaks, thus minimizing resource damage.
- Page 60 Livestock Grazing

 The statement on livestock grazing in Mount Diablo State
 Park clearly shows how detrimental the grazing can be to the
 natural resources. We have observed these changes and would
 like to have all grazing terminated. The proposed interpretive
 cattle ranch on the Macedo Ranch would be a compromise.
- Page 63 CCC Architecture

 We urge that the work on the restoration and renovation
 of the Summit Building proceed promptly and that the exhibits
 for the museum be prepared and installed as soon as the building
 is restored.
- Page 80 Geology Auto Tour

 We favor an early installation and interpretation for the Geology Auto Tour, using identified safe pullouts.
- Page 96 Health and Safety
 We urge that the proposed new water system and the rehabilitation of the road system be funded and given a high priority.
- Page 101-102 Employee Housing and Staffing As the park is enlarged and additional staff is required, all the present employee housing will be needed. This housing use should not be curtailed or the housing used for other purposes. On page 115, Operations and Concessions, the statements include the growing demand on the park, the difficulty for the existing staff to adequately maintain the park, the difficulty for staff to provide adequate time for both ranger enforcement and interpretive/resource management, and that the park residences, offices and maintenance facilities may conflict with public use. Staff residences on the mountain are greatly needed. Adequate housing outside the park would be costly to the staff and would add additional mileage and expense. We have never considered that these facilities conflict with public use. It may be difficult to maintain high quality staff for Mount Diablo State Park if adequate housing and living conditions are not available.

- Page 110 Recreational Use

 We feel that all-terrain bicycle access to the park's fire roads and trails is not consistent with preservation of the natural resources. We question the advisability of opening the whole park to bicycles. No trails should be open to bicycles. In fact some trails should be designated for "pedestrian use only." Walkers and hikers need trails they can use to enjoy peace and quiet and where they do not have to step aside for bicycles or horses. A wilderness designation would be desirable. Bicycle use should be limited to specific fire roads designated for this use.
- Page 113 Significant Public Issues Trails and Access

 There is a need for continuous trail maintenance and a comprehensive trail plan. A study needs to be made so that duplicating trails are discontinued. As acquisition of land continues, new trails will be necessary. We have a dream for a new trail that circumnavigates North Peak. Hikers would appreciate this beautiful natural area.
- Page 120 Plan Concepts and Policies

 The "open space zones" concept where no development will occur and the area revert back to a natural state should be instituted.
- Page 131 Facilities Element Juniper Camp

 New restrooms with chemical flush toilets would be fine,
 but we strongly oppose providing showers and a sanitary dump
 station. Self-contained motor homes should use sanitary dump
 stations outside the park. Water is in short supply and needs
 to be conserved. To provide these facilities will require more
 maintenance and staff. We object to any showers being provided
 in our park (Pioneer, Junction, Live Oak and the proposed
 campground on the Schwartz property. Keep Mount Diablo State
 Park as a wilderness park, not a city or urban park.
- Page 136 Operation Areas

 We approve of a parking or staging area in the vicinity of Camel Rock on North Gate Road, but delete that the trail to the northeast leads to Donner Canyon. Substitute: The Burma Road trail leads to Moses Rock Spring and up to Juniper Campground.
- Page 137 Perimeter Recreation Areas
 With the improvement of the access point for Perkins
 Canyon, a trail to North Peak should be developed.
- Page 141 Architectural Design Concepts
 We hope new outdoor furniture will be kept simple and easy to maintain.
 There would be no need for solar space heating or solar water heating if showers are eliminated.

Page 165 - Alternatives

We support Alternative #2, Restoration and Minor New Development. Since the Preliminary General Plan is to cover use and development over a 20 year period, we feel that the new family campground and the campground for the disabled may not be developed for many years. We oppose over development with flush toilets or showers as using too much water.

The following is our list of priorities for Mount Diablo State Park:

- 1. Fund and build the proposed new water system and rehabilitate the road system.
- 2. Implement the Wildfire Management Plan.
- 3. Continue the study for the consolidation of the communication facilities and complete a long-range telecommunication plan which removes these facilities from North Peak.
- 4. Waterproof the Summit Building and install the exhibits so that the museum can be opened.
- 5. Improve and maintain the trails. Designate certain trails for pedestrian use only. Build a new trail around North Peak and a trail from Perkins Canyon (or the east side of the mountain) to North Peak.

In conclusion we are anxious for the General Plan to be implemented and our park managed to protect and restore the natural resources and to provide recreation for the people, consistent with protecting these resources.

Sincerely yours,

Milliam Sattler Beneinen Settler

Stuart Hong, Project Manager Felix Arteaga, Superintendent Diablo District California State Park and Recreation Commission:

> Manuel Mollinedo, Chairman Marie L. Escola, Vice Chairman John Allard, Commissioner Frank DeVore, Commissioner Dee Hedborg, Commissioner Marcia Hobbs, Commissioner Charles Hostler, Commissioner Raymond Nesbit, Commissioner John Whitehead, Commissioner

MR. JAMES DOYLE, SUP. ENVIRONMENTAL REVIEW SECTION DEPT. OF PARKS AND RECREATION P.O. Box 942896 SACRAMENTO, CA. 94296-0001

DEAR MR. DOYLE,

In my review of the Mt. Diablo General Plan, I find no consideration made for traffic problems created by the acquistion of the lands on Morgan Territory. This is a grave and possibly fatal oversight. The condition of the Morgan Territory Road is clearly just adequate for the residental use in the area. Your proposed creation of additional staging sites off of Morgan Territory will greatly increase the current problems created by the State Park. I am sure you are aware of the problems caused by the current interfacing of Morgan Territory and the park, the increase in illegal parking, trespassing, and litter. Any increase in that interface must be planned, and a traffic study should be an essential part of that plan.

I DO NOT LIVE IN THE MORGAN TERRITORY AREA, BUT I AM APPALLED BY THE LACK OF CONSIDERATION YOU SHOW TO THE PEOPLE WHO LIVE IN THAT AREA. ANY EXTENSION OF PARK LANDS SHOULD REQUIRE A COMPREHENSIVE TRAFFIC PLAN, AS I HAVE MENTIONED, AND YOUR GENERAL PLAN LACKS ANY PROVISION FOR THIS. THANKWOU FOR THE OPPORTUNITY TO RESPOND TO YOUR PLAN, AND PLEASE CONSIDER MY RESPONSE.

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RESPECTFULLY

SADIE EMMERMAN

276 5480 A ROUNDTREE DR.

CONCORD, CA. 94521

BOARD OF FORESTRY

PROFESSIONAL FORESTERS REGISTRATION

P.O. BOX 944246

SACRAMENTO, CA 94244-2460 TELEPHONE: (916) 445-6843 445-3014



August 25, 1989

JG 2 5 1989

ARKS & RECREATIO

Mr. Henry R. Agonia Department of Parks and Recreation 1416 Ninth St. Sacramento, CA 95814

Re: DEIR 86032517

Dear Mr. Agonia:

Professional Foresters Registration has concerns with the Preliminary General Plan for Mount Diablo State Park, DEIR #8603-2517. Our comments are in addition to those submitted under separate cover by the Department of Forestry and Fire Protection (CDF) who shares fire protection responsibilities for this project area. The Board of Forestry has authorities which are not carried out by CDF, such as the licensing of professional foresters.

Portions of an EIR fall within the authority of the Professional Foresters Law in the situation noted below. Code makes it clear the EIR itself does not have to be prepared by registered professional because it is a "disclosure document" (Section 15151, Title 14, California Code of Regulation). This Section goes on, however, to state that "only registered professionals can prepare technical studies which will be used in or which will control the detailed design, construction, or operation of the proposed project and which will be prepared in support of an EIR." Thus, any original field analysis of, or "design and operation" proposals for, "forest resources" require a registered professional forester (RPF).

The Law states a RPF is required when dealing with "lands bearing associations of trees and other woody plants in particular; investigation of wildland soils, plants and animals, and the ecology thereof" (Section 753, Public Resources Code [PRC]). This same section of the law says "Forestry... refers to the science which treats wildland resources in general, and of the application of scientific knowledge in the fields of wildland protection,... watershed management,... [and] water pollution control on wildlands..."

Wildland may involve valley, foothill, or coniferous forests, including riparian forests. Such forests involve primarily indigenous, but can include introduced species. Wildland essentially retains the natural character, but <u>may</u> involve interspersed houses and/or outbuildings and related improvements. Such lands may be converted to non-forest uses through the Environmental Impact Report (EIR) process.

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Department of Parks and Recreation Page 2 8603-2517 August 25, 1989

Often, the professional foresters law is misinterpreted to apply only to <u>commercial</u> timber operations and Timber Harvesting Plans which involve the RPF in the Z'berg-Nejedly Forest Practice Act of 1973. This other law logically included this Registered individual for the purpose of plan preparation. It was enacted one year <u>after</u> the Professional Foresters Law which addresses forest resources in general. The Professional Foresters Law is not limited to commercial timber operations.

Please insure compliance with the law in any management plan or technical report which will be used in, or which will control the detailed design, construction, or operation of, the proposed project as required. Vegetative management techniques to trees and woody plants outside CDF's fire control authority is also applicable. Feel free to contact me if you have any questions. I would appreciate a reply in writing stating how you will incorporate professional forester standards.

Sincerely,

Robert G. Willhite, RPF 1711 Executive Officer

Encl.: PRC, 14 CCR

cc: Dave Wachtel

CDF, Santa Clara Ranger Unit

Ken Delfino and Bruce Bayliss, CDF Headquarters

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation PO Box 942896 94296-0001 Sacramento, CA

Sept. 5, 1989

Comments on Mount Diablo State Park Preliminary General Plan

Dear Mr. Doyle:

I have read through the Preliminary General Plan for Mount Diablo State Park and would like to make the following comments:

- Overall, the Plan seems to make a number of very good (1)suggestions for Mount Diablo State Park. In general, I support the Preliminary General Plan.
- Several key planning efforts seem to be deffered in this (2) General Plan for future planning efforts. Thus, the Department proposes to develop plans to manage Endangered Species and develop a Vegetation Management Plan. I don't disagree with the wisdom of preparing such plans, but I question that the General Plan can be considered complete without these additional plans being prepared. Also, what steps will the Park take to ensure public participation in preparation and review of these plans?
- The grazing policy is strongly supported by myself and (3) many others. Commercial cattle grazing has no place in a State Park. I strongly urge you retain this policy despite the special interest pressure from the grazing industry and the current grazing leasee.
- The policy on transmission towers and other communications (4)facilities is too weak. The goal of the Department should be to eliminate such facilities on the North Peak and consolidate facilities on Mount Diablo peak itself. Considerable testimony to this effect has been received by the Department.
- Overall, the interpretive element is quite useful and inter-(5) esting. I am pleased by the range of subjects and ideas to be covered. Mount Diablo is an important urban resort fort the general public -- a wide variety of ideas can and should be explored, as outlined in this section. I am also pleased that the Department has taken several ideas Culti from outside groups (such as the proposal for the astronomical observatory) showing the responsiveness of staff to the public. Well done!

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- (6) One suggestion for interpretation: You propose to repair and maintain campfire areas for campfire talks as part of the interpretation program. At the risk of being a stick in the mud, may I suggest that campfire programs be discontinued, with the interpretive angle being an explanation on why campfires are no longer appropriate (e.g. air and visual pollution, fire hazard, and using up downed wood that would otherwise decompose as part of the nutrient cycle)? Just a thought.
- (7) I am disappointed that the plan does not include any Wilderness designations. Mount Diablo State Park is an ideal location for an urban Wilderness designation. Please reconsider.
- (8) A General Plan should include expansion proposals for new land purchases. While the Plan does include some planning for use of some acquisitions, I do not feel these plans go far enough, nor are there specific goals set for acquisitions (perhaps there is another document that identifies acquisitions? It should be reflected in the General Plan).

As I have said before, I think the Planning Staff of the California Department of Parks and Recreation have done an excellent job in preparing this plan and dealing with the public under extremely trying circumstances generated by the cattle industry and the current grazing leasee. They should be commended for holding up under extreme pressure.

Thank you for the opportunity to comment and for providing me with the opportunities for involvement with the rest of the public.

Sincerely yours,

Mark J. Palmer

MALler

6014 College Ave.
Oakland, CA 94618



September 8, 1989

James M. Doyle Supervisor, Environmental Review Section California Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

RE: Mount Diablo State Park Preliminary
General Plan and Draft Environmental
Impact Report

The Town of Danville appreciates this opportunity to review the Plan and is in support of the effort to plan for the future of Mount Diablo State Park. We offer the following comments for your consideration:

TRAILS AND ACCESS

The Town of Danville is in agreement that a comprehensive trail plan is needed and we urge the State to undertake this task as soon as possible. Enclosed for your use, is a copy of our recently completed trails plan. The specific concern is the connection of the trail system at Mount Diablo Scenic Boulevard.

As stated on page 113 there is a definite need "for more access points, staging facilities and parking areas on the periphery of the park." However there was no clear identification of possible locations adjacent to the Town.

MOUNT DIABLO SCENIC BOULEVARD

Mount Diablo Scenic Boulevard is in obvious need of repair. Much of the disrepair is due to the inability of all the responsible parties to come to a mutual maintenance agreement. The Preliminary General Plan for Mount Diablo State Park suggests that the road be rehabilitated to County standards through a joint funding effort of the homeowners, Athenian School, the State and Contra Costa County.

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510 La Gonda Way • Danville, California 94526

(415) 820-6337 9-8/28 Mt. Diablo page 2

Mount Diablo Scenic Boulevard is one of the two major entrances to the park and visitors of the park traverse over Danville streets to reach the park entrance. The Town of Danville offers the following concerns regarding implementation of the Preliminary General Plan and EIR recommendations to improve the road facility to County standards:

- 1) A recommendation to improve the road to County standards is not complete unless it can be demonstrated that sufficient right-of-way exists.
- 2) Upgrading the road facility will require straightening and/or widening the road in several areas which most likely will cause a significant amount of environmental impact due to the development. The EIR does not sufficiently address these issues.
- 3) The General Plan nor the EIR addresses the feasibility of implementing County road standards on Mount Diablo Scenic Boulevard. A higher comfort level with this recommendation could be achieved if the County's involvement and concurrence could be confirmed.
- 4) The State should take a proactive role in acknowledging that this entrance road needs upgrading <u>before</u> any of the proposed expansions are implemented.

Paul W. Niemuth, ASLA Project Coordinator

cc Parks Commission

James M. Doyle, Environmental Review Section, Department of Parks and Recreation, Sacramento, California

Dear Mr. Doyle:

Men: Mount Diablo State Park General Flan
Natural Resource Element: Vegetation Types
and Plant Communities

I wish to comment on the listed plant communities for Mount Diablo, especially one (#1 below) which should be corrected. Other differences are perhaps to some degree a matter of opinion. It would have been helpful if the author had stated whose system of clasification she is following and what modifications; if any, had been made.

1. Broadleaf Evergreen Forest: Live Oak Forest. Page 29 One of the most interesting features of the Mount Diablo flora is the presence of both the Coast Live Oak (Quercus agrifolia) and the Interior Live Oak (Quercus wislizenii). As indicated by their names, the coast live oak grows in the Coast Ranges; the interior live oak; is a tree of the interior, primarily growing around the Great Valley on its foothills. Ecologically and geographically, including both in the same plant community can not be justified. The live oak forest is the correct designation for the coast live oak. the interior live oak is usually monsidered to be a member of the Foothill Woodland. (Munz &Keck flora p. 903, Griffin in Terrestrial Veg., 1988, p. 388). Griffin points out that live oaks are more important in the uplands. He recognizes an Interior Live Oak Phase (p.400). He states: "in low-elevation foothill woodlands, Quercus wisligenii appears as widely spaced trees or sprout clumps, ... with increasing elevation, particularly on north asrects, Quercus wislizenii becomes a more significant part of the canopy. Finally ... Quercus wislizenii almost excludes Quercus douglasii from the woodland. The interior live cakes are too dense to support a typical grassland ground cover and are considered here as a scrubby evergreen phase of the foothill woodland." This essentially describes the situation on Mount Diablo.

It is clear from the distribution of the two species on Mount Diablo that Quercus wislienii, the interior live oak; will stand more cold and drier conditions than the coast live oak. On Mount Diablo, coast live oak does not grow: above 2800 feet elevation. It changes from north-facing slopes at the lower elevations to south-facing slopes as it approaches its upper limit. The distribution of these two species is discussed more fully by Bowerman (1944).

2. Central Coastal Scrub
Perhaps the rentral question is how is a community defined?
I would not give understory species on Mount Diablo the dignity
REGENER labelled a separate community.

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- Of the eleven species listed in the Munz and Keck Flora as typical, only three grow on Mount Diablo: Salvia mellifera, Artemisia californica, and Eriophyllum confertiflorum. Mimulus (Diplacus) aurantiacus and Baccaris pilularis are listed as an element in the northern coastal scrub. On Mount Diablo,, these species occupy somewhat different niches and altitudes although all may be found on the margin of chaparral. They do not form a distinguishable plant community. Seeds of black sage germinate abundantly following fire, and may persist as an element of the chaparral. I recard these species as predominantly a seral stage.
 - 4. Pinyon-Juniper Woodland: California Juniper Woodland The search for rossible validation of this designation lead to Terrestrial Vegetation (1988 printing), which includes a chapter ## entitled Transmontane Coniferous Vegetation of the Great Basin Floristic Province, written by Vasek and Thorne. After discussing the Northern Juniper Woodlands, with Juniperus occidentalis the dominant species, Vasek and Thorne discuss Pinyon and Juniper Woodlands. Pinyon-juniper woodlands in California are interpreted as vegetation types having one or more of the following species as a conspicuous emergent above a shrubby or herbaceous understory. The three pinyon pines, Utah juniper (Juniperus osteosperma) and California juniper (Etaniperus californica) are listed. As anticipated, the geographic range is given as mainly transmontane. However, the distribution of Oneleaf pinyon pine appears solid and extensive from Antelope Valley to eastern Santa Barbara County and to Pine Mountain in western Ventura County. The Great Basin character of pinyon woodland essentially stops at Fine Mountain summit. D ense stands of large Pinus monophylla trees are associated with Cercocarpus betuloides, Fremonto dendron californicum, Garrya flavescens, and Arctestaphylos glauca. (page 817). Quercus dumosa, Adenostoma fasciculatum, Ceanothus and other chaparral shrubs occur in the more open phases of the shrubby woodland.

California juniper, but not the pinyon pine, continues northward. Hoover (1970) reported a juniper-oak woodland, including Quercus Bouglasii and Haplopappus linearifolius, on Caliente Mountain and the higher parts of the Temblor Range. Vasek and Thorne (p.818) state: "Northward, junipers gradually lose identity as a major vegetation type and tend to occur in small patches at the lower elevational margin of oak woodlands or on locally dry edaphic features, as on rock outcrops on Mount Diablo (Bowerman 1944) and the arid east side of the Mount Hamilton Range (Sharsmith 1945)." This progression makes it clear to me that California juniper in our area has become a member of the local assemblage and can no longer and ean no longer be considered and treated as California juniper woodland, a part of the pinyon-juniper vegetation type. he characteristic associated species are quite different in the two communities, with the exception of Haplopappus linearifolius and perhaps Quercus dumpsa.

Griffin (Terrestrial Veg.,p.392) recognizes Juniperus californica as a "minor associate" in the blue oak phase of the foothill woodland.

He, too, recognizes that the blue oak phase of the foothill woodland merges with the western fringe of the southern stands of the pinyon-jumiper woodland.

On Mount Diablo, the junipers are widely scattered, often solitary shrubs or small trees, from the base to the summit. They are most numerous on rocky hillsides, particularly on or near rock outcrops on the summits. Their distribution appears to be controlled by edaphic factors. Shrubs found rarely in woodland are small. Associated plants include Pinus sabiniana, Quercus wizlizenii, Quercus chrysolepis, Umbellularia californica, Cercocarpus betuloides, and Stenotopsis linearifolius (Haplopappus).

I agree with Griffin and others that, on Mount Diablo, the California juniper (Juniperus californica) is best designated an element of the Foothill Woodland. It is associated more closely with Quercus wizlimenii, the interior live oak, than with Quercus douglasii, the blue oak, on the north side and about the summits.

(Note: The composition of the vegetation on the mocky north side of North Peak should be re-evaluated. Juniper there is associated with a remarkable assemblage of plants including oaks (Quercus chrysolepis, Q. dumosa, Q. wizlizenii var. frutescens), pines, and bay together with chaparral elements, such as Cercocarpus betuloides, Holodiscus discolor, Photinia arbutifolia, Ptelea crenulata, Rhus diversiloba, Ceanothus cuneatus, Stenotopsis or Haplopapo linearifolius.

- The author defines this community as "the association of species restricted to, or occurring on, excosed fock," following Bowerman (1944). Exposed rock implies rock outcrops. The term rock so ciety, as used by both of us, toncludes plants predominantly of rocky ground and talus slopes about the summits as well as those species which are restricted to rock outcrops.
- 6. Mixed chaparral (p.28)
 The wind poppy, Stylomecon heterochylla, is an inhabitant of woodland and is frequent following burns in woodland. It is not considered a "fire plant." The fire poppy is Papaver californicum. On Mount Diablo, the fire poppy colonised a hillside in Back Canyon in 1978, the year following the big fire. That slope had not suffered a fire for over fifty years, to my knowledge, nor had the fire poppy been seen on Mount Diablo during that time.

 The name on page 28 should be changed to Papaver californicum.

Please send copies of these comments to the Project Manager, Stuart Hong, and to the Resource Division.

Respectfully submitted,

Mary L. Bowerman, 970 Second St., Lafayette, 9454



CALIFORNIA NATIVE PLANT SOCIETY: san francisco bay area chapter



September 6, 1989

Mr. James Doyle, Supervisor Environmental Review Section State of California--The Resources Agency Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Re: Mount Diablo State Park Preliminary General Plan

Summary of comments:

- 1. Wilderness and Natural Preserve Designations for areas containing sensitive plant resources: We urge staff to reconsider these designations in the plan.
- 2. Prescribed burning and the wildfire management plan as the primary vegetation management tools: We endorse staff recommendations on these points.
- 3. Elimination of commercial grazing in the park and the reduced grazing area proposed as part of the ranching interpretation program: We support staff recommendations on these points.

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Dear Mr. Doyle:

As you may know, the California Native Plant Society (CNPS) is a statewide organization dedicated to the enjoyment and preservation of California's native flora. The 1,400 member San Francisco Bay Chapter (Alameda and Contra Costa Counties) has a long term commitment helping to protect Mount Diablo's plant resources. With 16 CNPS listed plant species, several species of special interest, many State of California Significant Natural Areas, as well as over 500 native species in 14 plant communities, Mount Diablo State Park represents the single most important opportunity we have to protect our local native flora.

The Draft General Plan has been reviewed by our full conservation committee, its appointed Mount Diablo Plan Subcommittee and our Rangeland Management Subcommittee. Our full Chapter Board of Directors has approved this review; the comments in this paper represent our chapter's consensus viewpoint.

State Park policy basis for comments:

"The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of the ecological regions of California..."
"Each state park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes to the extent compatible with the primary purpose for which the park was established."
PRC SEC 5019.53

Preliminary General Plan Statement of Primary Purpose:

As now stated in this Preliminary Plan:

"The purpose of Mount Diablo State Park is to make available to the people for their inspiration, enlightenment, and enjoyment, in essentially natural condition, the outstanding scenic features including the summit peaks and surrounding landscape; the outstanding natural values including geology and plant and animal life; the significant historical and archeological resources; and the scientific values therein.

The department shall define and execute a program of management to perpetuate the unit's declared values, and provide recreational facilities and interpretation that make these values available in a manner consistent with their perpetuation."

The San Francisco Bay Chapter of CNPS (S.F. Bay Chapter) believes the declaration of purpose for Mount Diablo State Park is an excellent basis on which to make management decisions.

1. WILDERNESS & NATURAL PRESERVE DESIGNATIONS.

Two land management area designations in the State Classification Act used to: "Define and execute a program of management...consistent with their (i.e. plant resource) perpetuation" are:

A state wilderness is further defined to mean an area of relatively primeval character and influence or has been substantially restored to a near-natural appearance, which is protected and managed so as to preserve its natural conditions, and which:

- (c) ... is of sufficient size as to make practicable its preservation and use in an unimpaired condition.
- (d) May also contain ecological, geological, or other features of scientific, educational, scenic, or historical value. State wildernesses may be established within the boundaries of other state park system units." PRC SEC 5019.68

and:

"Natural preserves consist of distinct areas of outstanding natural or scientific significance established within the boundaries of their state park system units. The purpose of natural preserves shall be to preserve such features as rare or endangered plant and animal species and their supporting ecosystems, representative examples of plant or animal communities...

Areas set aside as natural preserves shall be of sufficient size to allow, where possible, the natural dynamics of ecological interaction to continue without interference, and to provide, in all cases, a practicable management unit. Habitat manipulation shall be permitted only in those areas found by

scientific analysis to require manipulation to preserve the species or associations which constitute the basis for the establishment of the natural preserve." PRC SEC 5019.71

In the following quotes from the Preliminary General Plan staff develops a rationale asserting the recently approved Wildfire Management Plan precludes recommending wilderness designations in this plan and proposes yearly reviews of the concept:

"A designation of wilderness would: 1) provide unique recreational opportunities for solitude and primitive and unconfined types of experience; 2) direct DPR to manage these areas to provide for public use and enjoyment, and to restore and preserve their wilderness character; 3) limit public use to non-mechanical and non-motorized forms of recreation and; 4) limit management to non-motorized methods except in emergencies involving public health and safety." p.110

"Establishment of one or more state wilderness areas has been considered. However, such a designation would conflict with the approved Wildfire Management Plan, and its requirement to use mechanized equipment to implement the plan." p. 116

"Establishment of a designated state wilderness should be evaluated annually, and when wilderness opportunities and other management objectives become compatible, the department shall propose establishment of one or more state wildernesses in Mount Diablo State Park." p. 121

Should not the possible wilderness area boundaries be established in this plan, the management conflicts identified, and a possible time schedule for resolving these conflicts be established?

This would allow Park Operations staff, those responsible for important Wildfire Management Plan implementation decisions, and the interested public to work towards designation in a coordinated fashion. We at the S.F. Bay Chapter see Wilderness Designation as necessary mitigation for proposed and future impacts resulting from generally increasing park usage and staff's peripheral planned development to accommodate this increased usage.

In the following quotes from the Preliminary General Plan staffs develops a rationale that does not support its recommendation.

"A designation of natural preserve would: 1) offer additional protections for significant unique natural resources; 2) provide for public recognition and appreciation of unique resource values; 3) direct DPR to manage these ecosystems for their scientific and educational values; and 4) prohibit roads and all facilities except trails." p. 110

"Designation of natural preserves may be merited. However, many areas of the mountain have distinct natural significance, and it may be impractical to encompass all of these scattered, unique natural areas as manageable units." p. 116

"Under present conditions, establishment of a natural preserve in the state park is not recommended at this time. Sensitive plant resources shall be managed for their perpetuation in accordance with the applicable laws, the policies, and the allowable use intensity designations." p. 121

We appreciate the challenge "To encompass all of these natural areas as manageable units" operations staff faces. However:

Do not significant degradations of Mount Diablo's listed plant species and their supporting habitats exist today as a result of uses and their impacts the openspace/undeveloped land use zoning would allow to continue?

The proposed zoning allows "No developed facilities except trails" and "low intensity recreation" (page 124 Preliminary General Plan.) Natural Diversity Data Base Field Survey Forms for Mount Diablo, some filed as part of this plan's field work, document increasing impacts to these resources from specifically these proposed allowed uses. The Rock Society associations, the serpentine grasslands and chaparrals, the Coulter pine forests, and the Mount Diablo manzanita association have suffered from these kinds of usages and/or management that does not take into account the specialized needs of these unique plant associations. Our chapter's 1989 season field work has confirmed these existing adverse impacts. We at the S.F. Bay Chapter believe that the neglect of the past, if continued into the future will result in additional significant impacts; certainly degradation and possible

loss of these plant associations.

Do not existing documented negative impacts resulting from higher park usage imply the need for more the careful management explicit in Natural Preserve Designation for these resources?

Careful management does not imply exclusion from the resource. We at CNPS believe it implies identification of and public education about the value of these areas. The goal of plant resource protection and the interpretative use of the resource is CNPS' primary goal. We, as a volunteer organization, would work closely with park staff to provide survey and docenting activities for these habitats.

Could not the General Plan include Natural Preserve Areas that have as part of their identification, management planning, and interpretive use the involvement of CNPS?

The "Valuable cooperative relationships" identified on page 9 of the Summary leads us to hope this work could be a positive contribution CNPS could make to native plant protection and enjoyment on Mount Diablo.

2. PRESCRIBED BURNING.

Recalling our opening summary of general state park goals and Mound Diablo's primary purpose, but putting aside sensitive plant associations with their potentially specialized management requirements, Mount Diablo contains some of the best remaining representative plant associations of so called "common" types and species in the East Bay. Rapid urbanization in our CNPS chapter area has lead us to place a much higher value on these today common, soon uncommon plant groupings.

"It is a policy of the department to preserve and perpetuate representative examples of natural plant communities common to a unit and the region (Policy No. 7; Resource Management Directives, 1831.1)

This is a policy CNPS can heartily endorse as setting a high management standard.

CNPS has long recognized and endorsed the concept of active vegetation management as critical "to preserve and perpetuate (p.51)" plant species and habitats.

"The primary objective of vegetation management of Mount Diablo State Park shall be to manage toward a natural condition, with a minimum of disruption to natural processes. A secondary objective shall be to restore and perpetuate the native plant communities that prevailed in the area prior to Euroamerican influences."

In the quote staff asserts that some specific natural processes have been disturbed and degradations have occured.

Staff assumes two major historical impacts needing mitigation:

Suppression of Natural Fires.

Land use practices, especially commercial grazing operations.

The plant resources element of the plan summarizes these impacts effectively in the limited space allotted. Staff recommends prescribed burns in combination with the Wildfire Management Plan as the primary vegetation management approach to realize management and mitigation goals.

We at the S.F. Bay Chapter view vegetation management approaches in two groups:

Those relying on intervention in natural processes, i.e.: prescribed burns, biological controls, habitat and wildlife restoration and those relying on so called artificial means, i.e. controlled grazing plans (not commercial grazing), herbicides and pesticides, mechanical clearance or logging. These are not exclusive approaches, each can have their value in management.

"Implementation of the wildfire management plan calls for improvements and additions to the firebreak system, as well as prescribed burning. Firebreaks are disc-plowed along sections of the park boundary, causing complete removal of vegetation, primarily annual grasses. In fuel modification zones,

plants will be thinned, mowed or burned." p.156

The S. F. Bay Chapter of the CNPS strongly endorses the Wildfire Management Plan and prescribed burn concept as outlined in the general plan.

We realize that the management plan will require further careful planning, implementation and monitoring of effects. We hope to participate in identifying potential plant impacts and monitoring real impacts.

3. ELIMINATION OF COMMERCIAL GRAZING.

As staff accurately described, commercial grazing has long been involved in altering California's native plant associations on Mount Diablo. Species composition within plant communities and balances between communities have been radically changed. Since "restore, protect, and maintain its native environment" (PRC Sec 5019.53) is the basic purpose of most state parks and especially Mount Diablo State Park;

The S.F. Bay Chapter of CNPS strongly endorses the discontinuance of current commercial grazing operations as rapidly as is consistent with protection of public safety and resources.

We believe that the physical structures (range improvements), human presence (necessary frequent pasturage shifting), incompatible terrain (steep geography), and impacts to plant communities (i.e. riparian, oak woodlands, and serpentine grasslands) preclude the primary use of cattle as a vegetation management tool at Mount Diablo except in a few as yet undefined low elevation areas.

Will "livestock grazing management plan for areas to ge grazed" (p 156) be subject to public review?

Finally, in the interest of brevity, and with the reservations expressed above concerning lack of natural preserve and wilderness designations,

Vegetation Restoration Plan.

The Resource Element of the General Plan proposes several actions to lessen the existing disruption to natural processes, and, secondarily, to restore and perpetuate the native plant communities. These proposals are to be made part of a vegetation restoration and management plan. The Resource Element also calls for a prescribed fire management plan and a wildfire management plan (the last has been completed). Specific proposals from the Resource Element include: (1) exclusion of concentrated visitor use and livestock grazing from riparian zones; (2) identification and mapping of native grasses, and development of methods for restoring native grasses; (3) restoration of oak regeneration; (4) mapping and subsequent control of exotic species; (5) further development of site-specific information for rare and endangered plant species to prevent their inadvertent destruction; (6) protection of special interest plants such as rock society plants; (7) landscaping consisting of indigenous plants; and (8) livestock grazing management plan for areas to be grazed." p. 156

We will have representatives at public hearings connected with the plan approval process and will be contacting those involved in this plan's formation and approval. Thank you for reviewing our concerns.

Signed

President

David John Bigham

Rare Plant Watch

S.F. Bay Chapter Field Coordinator

California Native
Plant Society

Conservation Committee Coordinator



James Doyle
Department of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001

Dear Mr. Doyle

September 8, 1989

Enclosed please find Save Mount Diablo's comments on the preliminary General Plan for Mount Diablo State Park. Save Mount Diablo has worked in association with the Department of Parks and Recreation for the past 18 years to expand Mount Diablo State Park and to protect the slopes of the mountain. We have enjoyed a successful cooperation with the Department over the years, and we have looked forward to the completion of the General Plan.

We have been pleased to receive and review the preliminary General Plan. While we are very supportive of most aspects of the General Plan, and are especially supportive of most of the Resource, Interpretive, Concessions, Operations, and Land Use Elements of the plan, we have grave concerns about the sheer scope of the Facilities element. We also do not believe the Environmental Impact Report details the impacts of expansion of facilities in a credible fashion. While the document indicates that in the event of large projects during the General Plan period more environmental impact analysis will be undertaken, this document proposes to study impacts related to the changes in policy proposed. In the absence of rationale for the changes and minus a more complete discussion of the environmental impacts of the changes, we are left wondering how policy changes were synthesized.

Considering the numbers of questions we have despite participation in the preparation of this report and given the short time staff will have to respond to these questions, we doubt whether full response can be prepared for the Commission hearing in November. We might suggest that the Commission hear only the elements for which response can be prepared and consider the Facilities element in another hearing.

As the informational elements of the preliminary General Plan are incorporated by reference into the draft EIR, please consider all the comments and questions below as comments on the Environmental Impact Report.

INTRODUCTION

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Save Mount Diablo believes the ecological resources of the State Park must hold precedence over most activities in order to protect the long term health of the mountain. Where possible, native ecosystems should be enhanced and resources restored. We support department staff in their RECEIVED

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"MOUNT DIABLO IS A NATIONAL NATURAL LANDMARK"

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James Doyle
Department of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001

Dear Mr. Doyle

September 8, 1989

Enclosed please find Save Mount Diablo's comments on the preliminary General Plan for Mount Diablo State Park. Save Mount Diablo has worked in association with the Department of Parks and Recreation for the past 18 years to expand Mount Diablo State Park and to protect the slopes of the mountain. We have enjoyed a successful cooperation with the Department over the years, and we have looked forward to the completion of the General Plan.

We have been pleased to receive and review the preliminary General Plan. While we are very supportive of most aspects of the General Plan, and are especially supportive of most of the Resource, Interpretive, Concessions, Operations, and Land Use Elements of the plan, we have grave concerns about the sheer scope of the Facilities element. We also do not believe the Environmental Impact Report details the impacts of expansion of facilities in a credible fashion. While the document indicates that in the event of large projects during the General Plan period more environmental impact analysis will be undertaken, this document proposes to study impacts related to the changes in policy proposed. In the absence of rationale for the changes and minus a more complete discussion of the environmental impacts of the changes, we are left wondering how policy changes were synthesized.

Considering the numbers of questions we have despite participation in the preparation of this report and given the short time staff will have to respond to these questions, we doubt whether full response can be prepared for the Commission hearing in November. We might suggest that the Commission hear only the elements for which response can be prepared and consider the Facilities element in another hearing.

As the informational elements of the preliminary General Plan are incorporated by reference into the draft EIR, please consider all the comments and questions below as comments on the Environmental Impact Report.

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ranchers to preserve ranching outside of the State Park, and should use whatever means possible to decrease the impact of the public on adjacent ranchers.

INTERPRETIVE ELEMENT

Save Mount Diablo supports a strong interpretation by State Park staff to educate visitors to the values of the Park. While we enjoy the wildness of the park, we nonetheless support interpretive displays at major trail heads and along the main access roads to the Park. Interpretation should also address the expansion of the Park, from Olmstead's original vision of 5-6000 acres to the present intention of a large park, including acquisition and public-private cooperation, such as the Blackhawk dedications. And while we do not support major increases in facilities, we support the renovation of the Summit bldg and the creation of the Astronomical Observatory. Great attention should be used in the design of displays that will resist vandalism and require minimal maintenance.

- p.77 How does the department intend to interpret the Blackhawk paleontological finds?
- p.80 We oppose a short range radio transmitter, since it will duplicate information provided at entrance gates, and because we do not believe new communication facilities should be added to any of the towers.
- p.82 What rationale suggests 600-1000 acres to support an interpretive herd of cattle? Where would these acres be? Can interpretive activities of cattle ranching be directed at and limited to Borges Ranch, in as much as Walnut Creek Open Space's mission is very different from the State Park's?

CONCESSIONS ELEMENT

Save Mount Diablo believes the State Park must not be used for private economic gain except for interpretative purposes. Public use should not be in any way limited by private activities, and staff time should not be diverted to regulating concessions. Where this is necessary, staff monitoring should be subsidized by the concessionaire.

p.90 What fees are currently assessed for grazing within the State Park? How was this figure arrived at and how does it compare to park grazing fees nearby and on the open market? Where are these fees used? Are they invested back in the State Park, or do they go to the State's General Fund? How many cattle graze within the State Park at present? How are these numbers regulated and monitored? How many people in total, attend interpretive events at Diablo Ranch? How does this compare with other interpretive activities. What staff involvement is necessary for these events? In what other State Parks is cattle grazing permitted, and in which ones has it been prohibited. Please include some history as to why grazing has been allowed at all, and the changes in other parks. Who are the grazers, how many of them are there, where specifically does each one graze, under what regulation, etc. What measures are being taken to regulate these grazers given the park's extremely (in our opinion) over grazed condition? What methods are used to judge whether grazing intensity is appropriate?

What fees are charged of communication tower sites? What is done to protect sensitive species in this area? Can funds be made available from tower fees for maintenance and protection of rare and sensitive species?

OPERATIONS ELEMENT

Given proposed increases in park size and activities, Save Mount Diablo supports increases in staffing levels. Considering the many staff changes in recent months, we question what activities are being undertaken to maintain staff expertise and experience directly related to Mt. Diablo?

- p.96 Facilities newer than 30 years include the Mitchell Canyon bathrooms.
- p.97 Why do Communication Facilities require security patrols of State Park staff? The entities that profit from the towers should provide their own security.
- p.100 What are the impacts of disking and brushing undertaken as part of the Fire Management Plan? Have affected areas been surveyed for sensitive species? How many acres will be affected by disking, by brushing, etc.
 - What factors affect closure of the park, and how can they be minimized? For example, when fire danger or snow conditions close all or part of the park, is it necessary to close Mitchell Canyon? Given proximity of perimeter areas to fire danger already, can an incremental increase in danger be regulated to maintain park use?
- p.102 Given proposed increases in facilities and interpretation, new accesses to the Park and continuing expansion of the Park's size, what additional staff will be needed? Why would there be any thought of decreasing housing considering probable additions to staff? Has the department considered leasing housing near the mountain?

What are average salaries for various staff categories. What considerations and allowances, if any, have been made for the high cost of living in the Bay area?

LAND USE ELEMENT

Save Mount Diablo very strongly believes that Mount Diablo State Park should be aggressively expanded, both to protect the mountain's resources, and to allow for the recreational needs of a growing population. A great deal of attention should be paid to trail use, maintenance and conditions, since this is the way many people use the State Park, be they hikers, runners, cyclists or equestrians. We especially agree that new accesses to the State Park should be developed, including at Riggs Canyon. And while expanded landholdings will allow expanded facilities, these should be considered very carefully. Riggs Canyon's rugged terrain, for example, is more suited for environmental camps along a Mount Diablo to Morgan Territory trail than for group camping. The entire Riggs Canyon-Oyster Point-Blackhills area should be similarly preserved as the North Peak-Eagle Peak area, in a 'wild' state. A campground for the disabled would be far more appropriate in additions in the Northeast part of the park or elsewhere. Lower elevation camping is more appropriate in other parks.

- p.109 The document suggests that most visitors come from within Contra Costa County, that the county will grow in population 15% in the next 15 years, then suggests an increase in park visitation of 15% annually. How were these figures calculated?
- p.110 Given increases in nearby recreational lands, such as the proposed Los Vaqueros Reservoir and the potential for camping facilities there, are additional car and group camping facilities necessary on Mount Diablo?
- p.113 Public issues identified include excessive widening and brushing of fire roads. Save Mount Diablo agrees the roads have been excessively widened, at great expense to vegetation. Roads should be widened only as necessary to allow the passage of fire prevention equipment. Brushing should only take place where vegetation overhangs the road, and then only to the line of the road cut.

What maintenance is being done on trails throughout the park? How are gullying and erosion being counteracted? Is there an overall trail plan for the mountain, otherwise what comprehensive planning is being done to provide trails on new lands other than existing fire roads?

Because there is so little level ground on the mountain, all of it extremely valuable to wildlife, special attention should be paid to these areas in placement of facilities. Because roads are closed during snowfall anyway, and traffic slows considerably, parking lots should not be expanded for these unusual events, but parking should be liberalized along the shoulder of the road.

- p.116 Designation of a cultural preserve in Rock City should be considered very carefully; the CCC stonework and buildings are indeed attractive and should be preserved where possible. The major focus on Mount Diablo should be the preservation of the mountain's natural resources and the interpretation of its natural history. We don't believe policy should be approved which would make it difficult to alter or remove the CCC structures where such removal would enhance the park's natural resources.
- p.119 Consolidation of communication facilities should be designed to accommodate adequate facilities but not unlimited expansion.
- p.122 Appropriate future additions also include the Murchio grasslands and canyon adjacent to the proposed maintenance yard in Mitchell Canyon.
- p.124 Save Mount Diablo has taken an aggressive role in local planning that will affect the mountain. The State Parks and Recreation Department should take an expanded role in these same matters where lands are appropriate future additions.

FACILITIES ELEMENT

Save Mount Diablo's biggest concern with the Preliminary General Plan is the huge expansion of facilities proposed, without sufficient rationale for the expansion or discussion of its impacts. While we fully support additional facilities necessary for interpretation such as the summit museum and the proposed observatory, we object to any expansion of the water system until more information is given regarding the impacts of the present system on wildlife and spring flows. At every turn new campgrounds are suggested with showers, toilets, etc. Where these can be hooked into urban supply, this might be feasible (though financially questionable), but otherwise should only be considered given a thorough understanding of the mountain's hydrology. And while camping facilities are

proposed all over the mountain, others are designated for future removal. We support sensitive campground development, especially 'primitive' camping with some drinking water but very little water development otherwise. We are concerned about the construction of a new maintenance yard in Mitchell Canyon.

- p.129 Where restrooms need replacement or repair, only low flow chemical toilets should be used. Since most of the areas where these toilets exist are along North- or Southgate road, and since many visitors travel past several developed areas during their trip, what need is there for additional toilet facilities?
- p.131 The recommendations listed for enhancing facilities are far too sketchy; what are the impacts of these enhancements financially, to the water system, in upkeep, in additional runoff from paved surfaces, etc. Most importantly, please diagram the existing water system; what expansions would be necessary to put drinking fountains at new sites, etc.
- p.133 How will moving the Southgate entrance station deter speeding along the three mile section of road in question? What impacts would moving the station have? The proposed site is very steep; what engineering work has been done on the feasibility of the move, what grading and cutting would be necessary, how visible would construction and grading be? If a new klosk is built in this area, consideration should be given for parking to allow access to Dan Cook Canyon.
- p.133 What are current and future maintenance needs? How much space is needed? What are the impacts of a new maintenance yard? Would the existing yard be removed and restored? If Fire prevention equipment would be stored in this yard, and would likely be moved into the park through its other entrances over city streets, might leased space outside the park be more appropriate? Space might be leased closer to other entrances, at Lonestar quarries for example.
- p.134 The document suggest that 85% of the campers in the state Park come from the Bay area, 50% from within the county (p.112), yet conclusions are made throughout the document that increased camping is supported. Further, rationale is suggested that the reasons for additional camping include Mt. Diablo's proximity to San Francisco and urban tourist attractions. Finally, despite continuing suggestions of more camping, in numerous instances the document suggests the elimination of existing campgrounds. It is our understanding that when fees were raised year before last, camping actually decreased. How does camping attendance increase as total attendance climbs, and how are projected camping needs calculated? What are they? Shower facilities and dump stations are available outside the State Park. These should not be duplicated within the Park.
- p.134 On this page Live Oak campground is proposed for conversion to day-use, on the next page group day-use is removed and campsites are added. Why the contradiction, and what would be its cost and impact? Since people come to the mountain to get away from urban life and for the view, existing campgrounds at higher elevations should probably be maintained. Why should campgrounds lower down be considered?
- p.138 What are the impacts pro and con of a parking area in a residential area such as Regency Meadows. Difused parking in areas adjacent to Walnut Creek's Shell Ridge Open Space seem to work very well, and do not result in parking lots becoming a problem for neighbors.
- p.138 What is the reason for paving the Mitchell Canyon or Macedo Ranch parking lots? What would be the impacts of additional runoff and decreased surface recharge on Mitchell Creek and its trout? What are the advantages over gravel lots?

- p.139 The document should more properly describe the proposed campground, in that it's not adjacent to the Diablo Mines; a facility adjacent to the Mines would presumably have far more impacts on the public.
- p.140 Save Mount Diablo strongly believes that a group campground is inappropriate in Riggs Canyon.
- p.142 What are the impacts of tripling the water storage with the addition of a new 500,000 gallon holding tank? Where and how visible would the tank be? Will the original be removed, and if a tank is to go near the proposed site of consolidation of communication facilities, how will the two projects be coordinated.
- p.142 Save Mount Diablo opposes the development of springs except as drinking water sources in close proximity to the spring. This is most appropriate in primitive campsites. What measures are taken to protect hikers from giardia and other contaminants.

MAPS

Map 1 All maps should be corrected to show the acquisition of the 631-acre Morgan acquisition and recent East Bay Regional Park District acquisitions to the east. The State Park now connects with the Regional Park at a corner. Recent EBRPD purchases include the Perry, Cardoza and Murphy properties, approximately 3 sections, as well the Marshall property some years ago.

Several inholdings are shown in bold face; all of them should be. Missing inholdings include the Diablo and Turtle Creek ranches and the Brumlevy property. The Boy Scout property, which is shown as an inholding, has been acquired.

Map 2 This map is unclear and confusing.

- Map 3 Please show what areas are leased for grazing, where the fences are, and who the tenants of each area are. Also include sensitive areas, such as riparian zones, slopes of excessive steepness, areas or rare and endangered species, etc. on this same map
- Map 5 Please add the Murchio grasslands and canyon as appropriate future additions.
- Map 6 What criteria determine whether an area is appropriate for development, specifically day-use vs. group-use vs. camping? For example, in Laurel Nook, an unusually fine development of bay trees is more suited for less intensive use than the proposed change to camping. For this reason, map information and descriptions of impacts and resources should accompany each proposed change in facility for comment by the public. Since this will not be possible in the short time before the November hearings, the Facilities Element should be dealt with separately.

In the existing use shown in Mitchell Canyon, the area shown is larger than in reality. The flatlands marked aren't currently used for day-use or camping. The view here should be preserved without facilities.

Map 10We support access to the State Park through Curry Canyon, but no automobile traffic should be allowed in the Canyon.

The proposed campground in the northeast corner of the State Park could have impacts on nearby vernal pools. Please map the pools; what would be the impacts of a facility of the size shown? The existing quarry could make an appropriate campground if vegetation is restored.

Particular care should be used in any expansion of facilities in the Muir day-use area. Native plum trees are found there and are very rare elsewhere in the area. While day-use is encouraged to allow visitors to see the trees, more intensive use is not. What effect will adding facilities have here, especially the proposed new sewer?

Map 7 To our knowledge, there is no residence (#7) in Donner Canyon.

ENVIRONMENTAL IMPACT ELEMENT

Save Mount Diablo expends a great deal of energy responding to the environmental impact reports of proposed developments around the mountain. Development in the State Park should be held to as high a standard as developers outside the Park are, where impacts to natural resources will be generated. Especially in regard to the impacts of facilities development the environmental impact element fails to adequately address impacts of the proposed huge expansion in facilities. How for example does the total of proposed new facilities compare with existing ones? Existing water use with proposed, etc.? Absent design and layout of facilities, it's very difficult to ascertain whether they're appropriate. Even Save Mount Diablo's Board, with many years of experience in the State Park, has difficulty with the vagueness of the proposals. If facilities are proposed in the General Plan, their impacts should be analyzed, since response to this General Plan will be the public's chance to comment on those impacts.

Given the vagueness of the report, we support alternative 2, Restoration and Minor New Development.

- p.152 Debris flows are most likely on steep slopes and in canyons. Facilities, especially campgrounds, should not be constructed in these areas.
- p.163 Riggs Canyon is extremely visible from a distance, as we've seen with grading on the Mariani property.
- p.164 We disagree that there are no significant impacts to resources; water supply is one example.

Save Mount Diablo has been pleased to review the preliminary General Plan. Thank you for allowing us to comment, and we look forward to the Department's answers to our concerns.

Sincerely,

Susan Watson, President

Susan J. Watson

Save Mount Diablo

CC

California Park and Recreation Commission Henry Agonia, Director, Department of Parks and Recreation Stuart Hong, Associate Landscape Architect Felix Arteaga, Superintendent, Diablo District



Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation Box 942896 Sacramento, CA 94296-0001

September 8, 1989

Re: Mt. Diablo State Park Master Plan - CEQA Review

Dear Mr. Doyle,

The Bicycle Trails Council of the East Bay, (BTCEB,) is an organization of concerned bicyclists whose goals include education other cyclists and the public in proper trail etiquette, minimizing of cyclists' impact on trails, cooperative efforts with land managers and other user groups to develop reasonable regulations for the use of public lands, and promotion of off-road bicycling recreational opportunities. How bicycling is treated in the proposed Mt. Diablo Master Plan is of great concern to us. We have been active in issues surrounding off-road cycling for nearly three years, and have been involved with these matters on Mt. Diablo for a year and one half. For discussion about our approach to bicycle use in State Parks and on Mt. Diablo, I have enclosed a package sent to Superintendent Felix Arteaga in luly. It includes two presentations we made to the California Recreational Trails Committee, (CRTC.) as well as a resolution passed by that group dealing with bicycle use in State Parks. There is also a BTCEB presentation made to land managers at the Sacramento Parks and Recreation conference in March of this year. These should provide background material regarding the activities of BTCEB.

Our comments about the Preliminary General Plan are based upon ideas that happen to be well expressed in the CRTC resolution passed in March of 1989, and mentioned above. It stated bicycling, along with hiking and horseback riding have been identified as important contributions to the health and welfare of the state's population, and ought to be fostered and encouraged by the state. It is popular, does not pollute air or damage environment. is

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available to all, and gives substantial pleasure and exercise. The resolution recommended that the Director implement a uniform bicycle policy recognizing that "off pavement bicycling is a legitimate and desirable activity..." State policy as finally adopted indicated also that bicycling is a legitimate activity for state parks. We believe a document as comprehensive and far reaching as the General Plan for Mt. Diablo should reflect these ideas and support bicycling as desirable activity on the mountain. Unfortunately, there are instances where the Plan falls short in this regard, perhaps because the plan was undertaken before off-pavement became as popular as it is today. On the whole however, the Plan addresses well the many issues facing the Park.

Please consider that since the April date of the new plan, the BTCEB has met with Mr. Arteaga to discuss mountain bicycles on Mt. Diablo. As a result of that meeting and in accordance with State Policy, allof the fire roads on the mountain will be open soon. The BTCEB will assist by installing signs as it has been doing, and by increasing the Bike Patrol on the mountain to educate riders about trail etiquette. Thus the plan should be changed wherever it states that only a few fire roads are open.

It is clear that the all terrain cyclist has been recognized a legitimate and full fledged trail user who should be considered as such where the plan discusses different uses or construction of new trails or facilities. In many instances the General Plan instead treats cyclists as second-rate users. Some examples follow.

In the Land Use Element, (LUE,) page 114, bicycling, whether on or off-road is considered to be a "Special Interest Activity." We believe this is inappropriate, since neither hiking nor horseback riding are given this special designation.

The statement of page 114 that there exists substantial opposition from other users to opening fire roads to cyclists does not appear to be well supported. At the 5th public meeting, held January 25, 1989, only one person spoke about mountain bikes, indicating he had "some concern" about permitting such use. In early 1988, BTCEB rode most of the fire roads on the mountain under special permit, and spoke with every user encountered. The response to bicycles was almost unanimously positive, the only negative remark coming from a commercial ride leader who said joggers and bikes occasionally went to fast for his horses. He hastened to add that the problem ceased with a few friendly words. Bicycle use in the Pine Canyon area since the State policy was adopted has resulted in no significant complaints even though it is one of the most heavily used areas in the Park. Ranger Tom

Bernardo was surprised to learn that his fears of problems did not materialize. In a recent phone conversation, Stuart Hong indicated that the phrase in question was based upon a questionnaire circulated in 1985, long before mountain bicycles became popular.

In several instances, bicycling is not included as a potential recreational use. Several example are listed below.

- * p. 123 Morgan Territory Preserve It is important to bicyclists to be able to ride between the Park and the Preserve. Bicycling is not addressed, and needs to be.
- * p. 128 Pine Pond photo caption should indicate pond is an important destination for cyclists as well.
- * p. 134 The interpretive kiosks at Curry Point should indicate the recreational values of cycling as well.
- * p. 137 The public easement at the North Gate entrance should be for cyclists as well.
- * p. 139 _ The Mitchell Canyon kiosks should illustrate equestrian and cycling opportunities along with hiking ones.
- * p. 139 Donner Canyon, #3, same as above.
- * p. 140 Finley Road terminus, #3, same as above.
- * p. 8 Perimeter Recreation Areas, same as above.
- * p. 66 Recreation Resources, opening paragraph, add bicycles.
- * p. 81 Interpretive Facilities at Mitchell Canyon Day-Use area, include cyclists.
- * p. 95 Existing Operations Summary, last paragraph should include "bicycle" into the park.
- * p. 104b Bottom photo caption must be changed to reflect new access opportunities in the park.

The BTCEB also believes it should be recognized as a volunteer group assisting park staff, as discussed on page 98. In 1988, BTCEB members gathered trail information for staff to be used in designation appropriate bike routes. Since the State policy went into effect in January of this year, BTCEB volunteers have been installing informational signs around the mountain. As more of the park is opened to off-road bicycles, we will be organizing additional "trail days" to install signs, and perform needed trail maintenance, and increase our trail patrol to educate trail users and notify park staff of problems.

We support the development of additional trail heads around the mountain as well as more campgrounds. It would be a good idea to reserve some camping area for non-motorized use only, encouraging hikers, equestrians

and cyclists to leave their cars at home. This would provide a needed service to hikers, equestrians and bicycle tourists who like to camp.

In summary, we are impressed with the care that went into developing the General Plan. BTCEB believes that bicycling has achieved great popularity since the plan was begun, and that cyclists have become responsible members of the trail community. The changes in the plan that we have suggested reflect this belief. Please contact us if you have questions. Naturally, we will be pleased to meet with you in person to review the necessary changes in more detail.

Very truly yours,

Michael Kelley

President, Bicycle Trails Council of the East Bay.



SAN FRANCISCO BAY CHAPTER • SIERRA CLUB

ALAMEDA • CONTRA COSTA • MARIN • SAN FRANCISCO 6014 COLLEGE AVENUE, OAKLAND, CA 94618 BOOKSTORE: (415) 658-7470 OFFICE; (415) 653-6127 CONSERVATION: (415) 653-6127

September 10, 1989

Mr. James M Doyle, Supervisor Environmental Review Section State of California Department of Parks and Resources P.O. Box 942896 Sacramento CA 94296-0001

Dear Mr. Doyle.

These are the comments on the Mount Diablo State Park Preliminary General Plan by the San Francisco Bay Chapter of the Sierra Club, which has 40,000 members in the Bay Area, many of whom visit and enjoy Mount Diablo.

(1) With regard to grazing, the Bay Chapter supports the Plan's reduction in grazing. The existing commercial grazing of more than 7000 acres of land or 78% of the grasslands and 94% of the riparian woodlands is obviously illegal and contrary to park purposes. By state law, state parks must be managed to restore, preserve, and protect native environmental complexes and commercial exploitation of resources is prohibited in state parks. This extensive grazing violates this law. The grazing also damages the resource by inhibiting oak regeneration, precluding the reintroduction of native species, causing erosion and terracing, and intimidating hikers.

The Bay Chapter takes no position on the proposal for limited grazing for interpretative purposes and notes the Plan's alternative of interpreting grazing without actual cattle grazing.

The Bay Chapter supports the fire suppression plan and its recognition that fire suppression does not require grazing and that grazing increases the fire problem in some situations. The rest of the state park system does not require grazing to adequately suppress fires.

- (2) The plan is deficient because it does not propose any wilderness for Mount Diablo. The northeast side of the park should be designated as state wilderness. It meets the statutory requirements, and there are not any similar wilderness areas in the vicinity.
- (3) The plan should have a goal of eliminating all communications towers from the park. Such towers are entirely incompatible with any park purposes.

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- (4) The Bay Chapter supports the specified acquisition policies and urges the Department to pursue all further acquistitions that are possible. The growth of Contra Costa County means that acquisitions must be made as soon as possible or they can never be made.
- (5) The plan properly reduces unnecessary employee housing in the park and the continues the prohibition of off road vehicles. Parks must be maintained to preserve natural values.
- (6) With regard to the alternatives for further development, the Bay Chapter supports Alternative 2, Restoration with Minor New Development. The park should be protected but other available funds should be used for acquisition, rather than new development. Any lands not acquired soon will no longer be available for acquisition.

Sincerely yours,

Alan Carlton

Conservation Chair

CALIFORNIA PARKS AND CONSERVATION ASSOCIATION P.O. Box 412

Sacramento, CA 95828

September 8, 1989

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

We have received the Mount Diablo State Park Preliminary General Plan and find that for the most part, if adopted, it would substantially improve the protection of natural and cultural resources while also generally improving recreational opportunities and support facilities.

We applaud the Department for its courageous position on the cattle grazing issue. In spite of the outcries from the special-interest cattle industry that apparently sees only the dollar value of park resources, the Department must meet the mandates of the Public Resources Code and maintain the integrity and long-standing preservation philosophy of the nation's best State Park System.

We believe, however, that dedicating even 1,000 acres to cattle grazing for interpretive purposes is excessive. Livestock grazing is just as antithetical to state park grasslands as is logging in redwood forests of the state parks. It would be absurd to propose that the Department allow active logging to interpret history at Humboldt Redwoods State Park. The same sound reasoning should apply at Mount Diablo State Park. Active interpretation of either of these industries is simply not warranted. If the cattle industry needs such interpretation it should either do it itself, or secure the funding to purchase an area specifically for this purpose. Mount Diablo was not acquired by the State for its ranching history, either originally or with the most recent acquisitions. All of the lands have been acquired to protect Mount Diablo's magnificent natural features and scenic vistas.

On a related issue, we encourage the Department to implement the Wildfire Management Plan as expeditiously as possible. Over the years the Department's fire management policies and techniques have proven to be effective and responsible both to park resources and to adjacent private property owners in protecting lives and property.

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6 Sep 89

Stuart Hong Development Section State of California Parks and Recreations Dept Sacramento, CA

Dear Sir;

I have recently become aware of the proposed Preliminary General Plan for Mt. Diablo State Park. I am impressed with the thoroughness and scope of this plan and, in general, support its goals and recommendations. However I disagree with the recommendation for interpretive ranching on state park land (pgs 81-82d).

I live in the development which abutts the Macedo ranch and am concerned about the impact an interpretive center could have on my neighborhood. The general plan discusses 3 alternatives for interpretive ranching and recommends alternative #3 which is the most extensive plan. This calls for grazing of 100 cattle (175 with calves) on upwards of 1000 acres of park land, construction of cattle-handling facilities, and establishment of a "Californio" period exhibit with long-horn cattle and people in period costume. I believe a facility of this scope on the Macedo ranch would cause an intolerable increase in people, traffic, noise, and dust and dirt, in my neighborhood and urge you to reject alternative #3.

If you believe an interpretive facility like the one proposed is warranted then please do not locate it near existing homes. Currently the Macedo ranch is a major entry point to park trails for equestrians, hikers, and bicyclists. I believe the ranch's use should be limited to this purpose.

Sincerely,

Richard Imes

Richard Imes 254 Imrie Pl Danville, CA 94526

RESPONSES TO COMMENTS

Because the vast majority of comment letters addressed only the grazing issue, we have divided the responses into two groups: 1) grazing related issues; and 2) other issues. The large volume of mail and the short time available to respond prevents us from responding to individual letters. Instead, comments are summarized from letters and then identified to a source (e.g., Save Mount Diablo). We identify one source per comment, although that same comment may have been made in many different letters.

Comments which are not directly related to the general plan or to environmental impacts of the plan may not have responses. Examples of such comments are those dealing with legal and financial aspects of specific land acquisitions in the park or grazing leases.

The responses to comments which follow are presented in the order of the Elements of the General Plan.

Mount Diablo State Park

Response to Comments Regarding Non-Grazing Issues

RESOURCE ELEMENT

Resource Element, general - Can the general plan be considered complete with so much planning deferred (e.g., the vegetation management plan, endangered species management plans)? How will there be public participation in the preparation and review of these plans? (Mark Palmer)

Response: General plans present general guidelines and policies for regulating land use, development and resource management for State Park System units. These deferred plans will fit within and add detail to the general policy directives.

In preparing these management plans, the Department will include whatever form and level of public participation is legally required and appropriate. Generally, the advice and assistance of knowledgable people is sought out.

pp 27-30 - Several comments on the naming and composition of plant communities and plant name corrections. (Mary Bowerman)

Response: Thank you for your letter. The Department will review this information and make those changes that are appropriate.

p. 32 Note that peregrine falcons have been reintroduced to the park. (Save Mount Diablo)

Response: Comment noted.

p. 32, 57 - The threatened Alameda whipsnake (formerly Alameda striped racer) is said to be at its greatest abundance at Mt. Diablo. Has there been a population study of the snake in the park? Are the snakes considered in planning prescribed burns? How will changing the size of the chaparral community in Mt. Diablo affect snake populations? (Save Mount Diablo)

Response: There has been no population study of the Alameda whipsnake. Prior to prescribed burning an environmental assessment is carried out. Such an assessment includes impacts and mitigation measures for sensitive species including the whipsnake. A management plan will be prepared for species in the park according to the policy on pg. 58.

The general plan does not intend to change the size of chaparral communities in the park, nor will this occur as a side effect of any general plan policy.

p. 32, 59 - How will the Mitchell Creek rainbow trout population be protected and increased? (Save Mount Diablo)

Response: The Department plans to continue protecting the watershed. In addition, removing cattle from Mitchell Canyon will improve the creek as trout habitat by lowering organic contamination of the water, lessening bank erosion, and improving the structure of riparian vegetation alongside the creek.

p. 121 - All fire roads in the park will now be open to mountain bikes. (BTCEB) $\,$

Response: See response to first question on p.110.

p. 122 - Mt. Diablo Scenic Blvd. should be improved to county standards as soon as sufficient right-of-way is secured. Improvement of the road should precede expansion of park facilities. The general plan/EIR does not address the environmental impacts of the road improvement project. (Town of Danville)

Response: The plan recommends rehabilitating Mount Diablo Scenic Boulevard to "acceptable" county standards through a joint effort with the Diablo Homeowners, Athenian School, State, and Contra Costa County.

The department has had on-going discussions with county planning staff since the beginning of the general planning process regarding the road issue. County staff is fully aware of the plan's recommendation and agrees that it would be appropriate for Mount Diablo Scenic Boulevard to be under county jurisdiction.

The proposed improvements would include strengthened road base, asphaltic concrete cap, drainage/culvert work, and safety measures. The road would maintain its same configuration. Minor widening would occur where feasible. An environmental assessment would be required prior to any work.

The plan has recommended the rehabilitation and upgrade of the park roads as a top priority.

p. 122 - The SF Bay Chapter of the Sierra Club urges the Department to pursue further acquisitions at Mt. Diablo SP.

Response: The appropriate future addition recommendations of the general plan were prepared for long-range planning purposes only. The objectives for these additions include public use, protection of natural values, such as viewsheds and watersheds, protection of cultural values, to tie into local parks, and to avoid conflicting adjacent development.

Priorities for acquisition are established as funding becomes available.

p.122 - The general plan should include more detailed land acquisition proposals. (Mark Palmer) ${\bf r}$

Response: See response to above question on p.122

p. 122 - Include the Murchio Canyon/grassland in Mitchell Canyon as an appropriate future acquisition. (Save Mount Diablo) ${\bf r}$

Response: The appropriate future additions section will be revised to include available and feasible portions of the Murchio property.

and its resources directly. How well this is accomplished depends on how the message is written. This medium will be used only if the transmitter(s) can be unobtrusively mounted.

p. 81 - Campfire programs should be discontinued, to discourage use of campfires and the problems they cause such as air and visual pollution, fire hazard, use of down wood. (Mark Palmer)

Response: Outdoor evening programs could certainly be conducted without campfires. On the other hand, a traditional campfire can add to the atmosphere of shared stories and songs. Perhaps a thought- provoking solution would be to talk about the pros and cons with the program visitors and let them decide whether the benefit of a small fire is worth the cost of using the wood and creating smoke.

p. 81 - For the interpretive ranch proposal: Why 600-1000 acres? Where would this land be? Can ranching be interpretive at the Borges Ranch instead? (Save Mount Diablo)

Response: The acreage, location, grazing season, and herd size have been determined by considering visitor, interpretive, and resource protection needs. The primary goals of the interpretive herd are to continue to offer to the public modern cattle handling demonstrations by a local rancher and to provide a context for interpreting the area's ranching heritage. One hundred cows plus their calves should meet these needs. The department's range management specialist has determined that 600-1000 acres will be needed to support this herd on a sustainable basis for half of each year. The Macedo Ranch area is the only park area that meets interpretive, range management, and resource protection requirements.

The National Park Service interprets "open range" ranching at the Grant-Kohrs National Historic Site in Montana using about 25-50 head on 1500 acres. The MacGregor Ranch Trust in Estes Park, Colorado interprets 1870s ranching using 70-130 cattle on 1,200 acres. These programs suggest that long-term successful ranching interpretation should be possible at Mount Diablo with the recommended 100 cows and 600-1000 acres.

CONCESSIONS ELEMENT

P.90 - How many cattle graze within the park at present? How are numbers regulated and monitored? How many people attend the interpretive events at Diablo Ranch? In what other State Parks is cattle grazing permitted and prohibited? What is done to protect sensitive species at the communication tower site?

Response: In 1988 approximately 600 cattle were grazing in the park, of which about 420-460 cattle grazed under the Diablo Ranch concessions contract. The grazing numbers are regulated by individual contracts and monitored by the concessionaire with park staff oversight.

From 1985-1987, we understand that approximately 1000-1500 visitors participated in the interpretive ranching program. Of this total about 400 saw cattle handling demonstrations. We understand that in 1988 approximately 2500 individuals visited the Diablo Ranch facilities. Total individuals visiting Mount Diablo State Park is around 500,000 per year.

Within the State Park System, grazing or concession contracts permitting grazing at the following State Parks and State Historic Parks: Mount Diablo State Park and Fort Ross State Historic Park. Units classified as State Beaches that permit grazing include Sonoma Coast and Pomponio. Approximate total acreage where grazing is permitted by contract is about 11,800 acres.

Through Resource Inventory efforts, known sensitive plant and animal species have been identified. Their presence will be taken into considerationw hen new projects are proposed in this area, as well as public use impacts. Future resource management projects may be proposed to restore sensitive areas.

OPERATIONS ELEMENT

p. 96 - The Mitchell Canyon bathrooms are less than 30 years old. (Save Mount Diablo)

Response: The third sentence of the first paragraph on p. 96 will be modified to account for this exception.

p. 97 - Why does Department staff provide security for privately-owned communications facilities in the park? (Save Mount Diablo)

Response: The Department does not provide on-going security patrol of the telecommunication facilities. However, operations staff will respond to emergencies and alarms since the facilities are within the park.

p. 98 - The Bicycle Trails Council of the East Bay should be listed as a cooperative organization. (Bicycle Trails Council of the East Bay)

Response: With mountain biking now an allowed use in the park (See response to first question p.110), and in recognition of the work the Bicycle Trails Council of the East Bay (BTCEB) has performed with the Department to educate people and promote mountain bike use, the BTCEB will be listed in the general plan as a volunteer group to the department.

p. 99 - The erroneous claim is made in the general plan that it (the general plan) was endorsed by the surrounding fire chiefs. (Wessman)

Response: The chiefs approved and signed the department's Wildfire Management Plan for Mount Diablo State Park, which they helped develop. The chiefs have taken no position on the general plan as a whole.

p. 100 - What are the impacts of discing and brushing (Wildfire Management Plan). Have affected areas been surveyed for sensitive species? How many acres will be affected? (Save Mount Diablo)

Response: Discing and brushing (to mineral soil) will cause some soil erosion until rains start the grass regrowth cycle. Both methods will provide effective firebreaks that cannot burn.

There has been a survey of sensitive plant species as part of the Resource Inventory of the Resource Element. This inventory will be referred to, as the Wildfire Management Plan is implemented. The 51 mile, 30 foot wide fire break, and proposed brushed areas will encompass about 200-300 acres.

p. 100 - A fire that started in the park last July did extensive property damage on an adjacent landowner's land because the Department had done nothing to reduce fuel or do anything else to retard the spread of a fire. (Wessman)

Response: The fire in question was started by a downed PG&E high-voltage powerline. Access to the fire was initially blocked by the same downed line. The terrain is steep and the fire burned upslope onto the landowner's inholding. Even so, the burn was limited to less than 2 acres, almost all on State Park property. Several of the landowner's corrals and sheds located on the property line were burned. State law (Section 4291 of the Public Resources Code) requires that the owners of structures in wildlands clear a firebreak and a fuelbreak around them. The State is not responsible for protecting private structures where the owners may not have not complied with the above requirements.

p. 100 - What factors affect closure of the park, and how can they be minimized? (Save Mount Diablo)

Response: Potential fire conditions are constantly monitored year-round in the park. When a high fire hazard potential is indicated, the entire park is closed to the public. Letting the public into perimeter areas of the park, such as Mitchell Canyon, during potential fire hazard conditions could cause problems and jeopardize public safety, because it would be extremely difficult to prevent park users from further dispersing themselves within the park.

During snow days, if conditions warrant, park roads will be closed to motor vehicles. However, park visitors can still enter the park by foot.

p. 102 - What additional staff will be needed at the park? How will they be housed? (Save Mount Diablo)

Response: Implementation of the general plan, with facilities development, resource management and protective programs, and interpretive programs and events, will correspondingly result in greater visitation and staff load. To meet the needs of the unit, increases in staffing, equipment, and operational expenses may be required to fulfill operational responsibilities at the park. Specific increases that may be required are not known at this time. This will be addressed when specific portions of the plan are implemented.

p. 102 - It is questionable that the Department can maintain the quantity and quality of staff needed to carry out the policies and manage the new developments proposed in the general plan. (Sattlers)

Response: See response to above question from p.102.

p. 102 - What are average salaries for park staff? Are there allowances for the high cost of living in the Bay Area? (Save Mount Diablo)

Response: This question is not relevant to the general plan. Information on the various classifications of park staff and corresponding salaries are available for review from the department's personnel office.

No special considerations are allowed for any state employees that live in high cost areas, including the San Francisco Bay Area.

LAND USE ELEMENT

p. 109 - How is visitation calculated? How is visitation related to increases in population or entrance fees? (Save Mount Diablo)

Response: Monthly visitation is calculated by day use and camping fees collected, counts taken (using pneumatic counters at the two main park entrance stations when no rangers are on duty), and an estimate of walk-ins and bicyclists based on surveys by park staff.

Projected increases in visitation are based on attendance figures from each of the last 5 years. The increased development and population of the surrounding communities has most noticeably increased the walk in and bicyclist attendance Visitor increases are also based on Park and Recreation Information System (PARIS) projections.

The 15% increase in population for Contra Costa County was projected by the Association of Bay Area Governments (ABAG) and the State of California Department of Finance.

The 15% projected increase in park visitation was calculated from a 15% increase in attendance each of the last five years for the park.

Increased day use and camping fees do not appear to have affected the steady increase in visitation over the last five years.

p. 110 - Access to the park's fire roads and trails by all-terrain bicycles is not consistent with preservation of the natural resources. (Sattlers)

Response: The general plan reflects the recently adopted mountain bike policy for the State Park System. The department's policy regarding the use of mountain bikes in units of the State Park System is as follows: paved and unpaved (fire roads, dirt roads, and service roads with a width of over five feet) park roads, unless otherwise posted, are open and trails closed to

bicycles. Unpaved roads may be closed and trails opened upon a written order by the District Superintendent, approved by the Regional Director, that specifically considers criteria which reflects the safety of all users and potential impacts to park resources and values.

p. 110 - Are additional family and group campgrounds necessary? (Save Mount Diablo)

Response: The plan recommends only two new camping facilities be developed over the next 20 years, a 50 unit campground and a handicapped camp. The 50 unit facility will be the only campground located at the parkrs perimeter. The handicapped campground will provide for a needed special activity use.

The proposed Los Vaqueros Reservoir camping facilities will meet a different and certainly needed, water oriented camping experience.

p.113 - A comprehensive trails plan for existing park lands and new additions are needed. New trails are needed (e.g., around North Peak) and duplicate trails should be eliminated. What maintenance, such as gulley control, is being done on park trails?

Response: The plan does recommend a comprehensive trail plan be developed for existing parklands and new acquisitions. Save Mount Diablo, equestrian groups and the Mount Diablo Interpretive Association will be among the groups the department works with on the trail plan.

The department is currently not providing maintenance of existing trails. However, equestrian groups are doing volunteer maintenance such as brushing, erosion control, and rock removal.

p. 113 - Roads should be widened only to allow passage of fire equipment. Brushing should not extend back of the roads. (Save Mount Diablo)

Response: The department agrees that sensitive fire road widening and brushing should occur. Closer supervision will be made during fire road grading and maintenance work. However, brushing will extend beyond the road's edge in order to create a more effective firebreak.

p. 113 - The general plan needs to show possible locations of new access points, staging facilities and parking areas adjacent to the Town of Danville. (Town of Danville)

Response: Location of a trail access point off Mount Diablo Scenic Boulevard, may be dependent upon the availability of any public open space that may be dedicated to the state or county as mitigation for the proposed new residential development near Athenian School.

Currently, the primary trail access point and perimeter staging and parking area for Danville residents, is Macedo Ranch. The existing facilities will be enhanced to help meet future demand.

p. 113 - Parking lots should not be expanded to accommodate unusual events; instead, parking should be liberalized along road shoulders. (Save Mount Diablo)

Response: Existing parking lots will not be expanded. The lots will accommodate additional motor vehicles by improving lot design which could include striping or other parking space designation methods. The plan recommends that selected turnouts be paved, where feasible, for parking.

p. 114 - Why label off-highway bicycling, but not hiking and horseback riding, as a "special interest activity" ? (Bicycle Trails Council of the E. Bay)

Response: Being a relatively new activity in the state park, mountain bicycling is a mechanized use and is considered a special interest activity.

Hiking and horseback riding have been very popular activities, even before 1931 when Mount Diablo was established as a unit of the State Park System. Hiking and horseback riding have long been considered traditional activities that have helped shape and develop the state park as it is today.

p. 114 - BTCEB's own surveys contradict the statement that a substantial number of park users oppose opening the park's fire roads to mountain bikes. (Bicycle Trails Council of the E. Bay)

Response: Over 500 park questionnaires were completed and turned in to the department. Nearly 40% of the questionnaires indicated that mountain bicycle use was an inappropriate activity in the park. There was also strong sentiment against mountain bike use at the first public meeting. Although mountain bike use was not legally allowed in the state park until January 1, 1989, mountain biking has been a popular activity since the mid 1980's.

p. 114 - The Department's mountain bike policy will jeopardize the potential for establishing wilderness areas in the park. State Parks should not be available to every new recreational activity, such as off-highway bicycling. (CPCA)

Response: See response to first question on p.110.

p. 116 - Boundaries for a potential state wilderness should be established in the general plan. Conflicts preventing wilderness designation can be worked out later. (California Native Plant Society)

Response: Nothing in the general plan would preclude future wilderness designation in Mt. Diablo State Park. At this time, however, conflicts such as the need to maintain fire roads make consideration of wilderness premature. Perhaps later, after the park boundaries are consolidated and the wildfire management plan has been well established, the possiblility of wilderness can be reconsidered.

p. 116 - Both the Department's Resource Inventory of Mt. Diablo State Park and the CNPS' own field work document impacts of higher visitor usage on the park's unique plant associations. These areas need the greater protection afforded by Natural Preserve designation. (California Native Plant Society)

Response: The general plan states that designation of natural preserves may be warranted. However, the documentation required to justity such designation has not been prepared. The Department can prepare this documentation as part of the vegetation management plan.

p. 116 - Designation of a cultural preserve at Rock City should not be done if it conflicts with the primary focus on preservation of natural resources and interpretation of natural history. (Save Mount Diablo)

Response: We agree. The focus of the Resource Element is on the protection and restoration of natural communities. At Rock City, parking will be centralized and restricted, and the vegetation management plan will address restoration of this overused area. We do not see any conflicts between establishing a cultural preserve and natural resource preservation.

p.119 - The Department should eliminate transmission towers from the park, (SC, SFBC) or eliminate them from North Peak and consolidate them on South Peak. (Mark Palmer)

Response: A previous study of all telecommunication towers and equipment on South and North Peaks concluded that a total consolidation of these facilities was not feasible. The television facilities on North Peak cannot be technically combined with South Peak's radio communication equipment, because of interference problems. However, a partial consolidation (which may be furthered studied by the department) could improve the appearance of the towers and equipment and be more visually compatible with the natural values of the park.

Other complications arise because a legal agreement with the owners of the North Peak telecommunication equipment does not allow the state to eliminate these facilities. Consolidation with others is at their discretion. The Navy facilities on South Peak are sited on their own property and cannot be eliminated by the state.

p. 119 - Consolidation of communications facilities should not allow unlimited expansion.

Response: A general plan objective and goal is to allow reasonable growth of telecommunication facilities, not additional towers.

Presently, a partial consolidation (which requires further study by the department) could improve the appearance of the towers and equipment and be more visually compatible with the natural values of the park.

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Response: The plan recommends rehabilitating Mount Diablo Scenic Boulevard to "acceptable" county standards through a joint effort with the Diablo Homeowners, Athenian School, State, and Contra Costa County.

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Response: The appropriate future addition recommendations of the general plan were prepared for long-range planning purposes only. The objectives for these additions include public use, protection of natural values, such as viewsheds and watersheds, protection of cultural values, to tie into local parks, and to avoid conflicting adjacent development.

Priorities for acquisition are established as funding becomes available.

p.122 - The general plan should include more detailed land acquisition proposals. (Mark Palmer) ${\bf r}$

Response: See response to above question on p.122

p. 122 - Include the Murchio Canyon/grassland in Mitchell Canyon as an appropriate future acquisition. (Save Mount Diablo) ${\bf r}$

Response: The appropriate future additions section will be revised to include available and feasible portions of the Murchio property.

p. 123 (also several other pages in the general plan) - Amend text to reflect the new access for mountain bikes. (Bicycle Trails Council of the E. Bay)

Response: The text will be revised accordingly. See response to first question on p.110.

p. 124 - Would the open space/undeveloped land use zoning allow significant degradation of Mt. Diablo's listed plant species and their supporting habitats? (California Native Plant Society)

Response: The vegetation management plan (p. 51) may call for active management activities to protect or enhance listed plant species and their habitats. Besides that, the only facilities or activities that would be allowed in the open space/undeveloped zone would be those related to dispersed recreation (e.g., hiking, horseback riding), fire prevention and control (e.g., fire roads, prescribed burns), and livestock grazing (e.g., fences, water troughs). An exception is the presence of telecommunications facilities on North Peak over which the Department has little control.

p. 124 - The Department should take an expanded role in influencing local planning decisions that affect the park or potential park acquisition lands. (Save Mount Diablo)

Response: The department will continue to work with local planning agencies and groups such as Save Mount Diablo (SMD) to protect and and if possible, expand the park. Thanks to the efforts of SMD, funding for acquisition has been made available during the 1970's and 1980's.

FACILITIES ELEMENT

p. 129 - Use chemical, low flow toilets where restrooms need replacement or repair. (Save Mount Diablo)

Response: Chemical toilets will be used where water is not readily available and there is not adequate space or suitable conditions for leaching fields.

A major goal of the plan is to develop more facilities around the park's perimeter. Because the park's facilities are a destination, and not simply a roadside rest for travelers throughout the area, toilets are essential.

p. 131 - Why landscape the upper summit lot? Would plantings be of Mt. Diablo stock? (Sattlers)

Response: The department recommends a more defined landscaped entry to create a worthy visual framework for the historic Summit Building. Shade trees would help provide public comfort from the wind and exposure.

Any new plantings in the Summit Area would be from the Mount Diablo gene pool.

p. 131 - What are the costs of the enhancements of facilities? How will these impact the water system? (Save Mount Diablo)

Response: The cost to develop all of the proposed development for the park will be substantial. The general plan will be used as a guide to request funding and prioritize projects. The new water system is essentially a rehabilitation of the existing water system with the exception of a new 500,000 gallon water storage tank. An environmental assessment will be conducted for any new proposed development project such as the water tank, parking lots, astronomical observatory, etc.

The current water supply system has a storage capacity of about 250,000 gallons. The two major 100,000 gallon capacity tanks are located near Buckeye and Oak Knoll Day Use Areas.

The present water system has severely deteriorated. Leaks are prevalent throughout the system and lose water each day. The water is used primarily for day use areas, overnight facilities, and operational needs.

Using the same draw rate from the existing water sources, the proposed 500,000 gallon storage tank and the rehabilitated, more efficient water supply system will save water and help accommodate future growth and visitation to the park, water needs for wildfire protection, water storage for drought years, and for new developments.

Engineering studies are being conducted for rehabilitating the park's water system. The technical plans can be reviewed with the department's engineering section.

p. 131 - Showers or dump stations do not belong at Juniper Campground or anywhere else in the park. (Sattlers)

Response: Shower facilities are conveniences the department provides in developed campgrounds. The department recommends low volume showers be provided in developed campgrounds. However, these facilities will not be developed until the existing water supply system is rehabilitated and made more efficient. A dump station is recommended since one is not readily available outside the park and it would help prevent indiscriminate dumping in the park.

p. 131 - Care should be taken before expanding facilities at Muir day-use area because of impacts on the rare native plum trees there. (Save Mount Diablo)

Response: Environmental impacts, including those to native plum trees will be analyzed during project planning and implementation.

p. 133 - What are the environmental impacts of moving the South Gate entrance? If this move is done, parking should be provided for access to Dan Cook Canyon. How would the move deter speeding on South Gate Road? (Save Mount Diablo)

Response: Moving the South Gate entrance station near the park's boundary will help deter speeding vehicles by providing a enforcement presence. Visitors will be informed of speed limits as they enter the park.

If the proposed entrance station is funded, an environmental assessment will be completed to analyze the impacts.

The plan recommends a parking and staging area to tie into the Dan Cook Canyon Trail, be developed in conjunction with the entrance station.

p. 133 - What are the environmental impacts of a new maintenance yard? How much maintenance space is needed? Will the existing yard by removed or restored? Will fire equipment be stored there? Are there better places outside the park to store fire equipment? (Save Mount Diablo)

Response: The existing maintenance facility, which would be retained, is at capacity for meeting current operational needs. As the park expands, new facilities are developed and the Wildfire Management Plan is implemented, substantial additional maintenance storage space will be required.

Before the storage facility could be built, an environmental assessment would be prepared.

The new storage area would house major fire presuppression equipment, not actual fire fighting equipment (that would come from California Department of Forestry and local fire fighting agencies). This equipment would stay within the park and would not be driven over city streets on a regular basis. The proposed location is recommended because of easy park access and adequate area that exists within park boundaries.

p.134 - Since most of the park's visitors come from the Bay Area (half from Contra Costa), why are new campgrounds needed? How is future camping demand calculated, and what will it be? Showers and dump stations are available nearby and should not be duplicated in the park. (Save Mount Diablo)

Response: Based on over 500 visitor surveys, additional campgrounds with easier access were requested. A goal of the general plan is to develop new campgrounds near the park's perimeter which would help alleviate some of the large camping vehicle, trailer, and motorhome traffic from the main park roads and make access to the campground easier for large vehicles.

Although Junction Campground and Boundary Group Campground are being converted to group day use, camping sites would be added at Live Oak Campground and Laurel Dell Day Use Area is being converted to camping. This would maintain about the same amount of camping within existing developed areas.

Camping increases for the park are based on user surveys and Park and Recreation Information System (PARIS) projections. PARIS has projected 1900 additional camping units are presently needed in Contra Costa County.

See response to third question on p.131 regarding showers and dump station.

p. 135 - What is being proposed for Live Oak Campground? Since people come to the park for the view, why are lower campgrounds needed? (Save Mount Diablo)

Response: The conversion of Live Oak Campground from day use to family campsites, eliminates user conflicts which mainly occur when camping and day use facilities are adjacent to one another.

See response to question on p.134.

p. 136 - The trail from Camel Rock leads to Moses Rock Spring and Juniper Campground, not Donner Canyon. (Sattlers)

Response: The correction will be made.

p. 137 - After access is improved for Perkins Canyon, a trail to North Peak should be developed. (Sattlers)

Response: The possibility of a trail from Perkins Canyon to North Peak will be addressed as part of the comprehensive trail plan.

p. 138 - What are the impacts of a parking lot at Regency Meadows? Why not diffused parking instead? (Save Mount Diablo)

Response: There is a public easement through the Regency Meadows development and property dedicated to the state, that is suitable for a small unpaved parking area. This area would help meet some of Clayton's demand for access at the park's perimeter.

p. 138 - Why pave the Mitchell Canyon and Macedo Ranch parking lots? How would this affect Mitchell Creek and its trout? (Save Mount Diablo)

Response: The paved surfaces proposed for Mitchell Canyon and Macedo Ranch would help to better define the parking area, thereby limiting cars from parking outside of the designated parking area, allowing for striping spaces for more efficient use of an area, less maintenance and costs, minimizing dust, and easier vehicle access and control.

Any adverse drainage impacts for the parking lots will be minimized by sensitively designing the parking areas

p. 138 - The meadow area at Mitchell Canyon should not be built on; use the residence area for the maintenance yard. (Sattlers)

Response: The proposed maintenance yard will be located near the existing housing adjacent to the park boundary. The meadow areas east of Nitchell Canyon Road are recommended to remain as open space.

p. 139 - Describe the exact location of the proposed northeast corner campground. (Save Mount Diablo)

Response: The plan describes the location of the proposed 50 unit campground as the northeast corner of the park, above the Diablo Mines. The East Facilities Plan accurately shows the site location.

p. 139 - What would be the impacts of the proposed northeast corner campground on nearby vernal pools? The existing quarry could make an appropriate campground if reclaimed. (Save Mount Diablo)

Response: The Department has little information about vernal pools in the vicinity of the proposed campground. Further investigation of these pools will be done as part of the vegetation management plan (p. 51). The vegetation management plan will be taken into account in the design and siting of the campground, which is a priority 3 (lowest) development.

p. 140 - Save Mt. Diablo opposes the proposed Riggs Canyon campground. (Save Mount Diablo)

The proposed location of the handicapped campground disperses recreation use around the mountain and does not develop new major facilities off the park's main roads. These are concepts and policies of the general plan.

The site for the handicapped campground is privately owned and would have to be acquired by the state and an environmental assessment completed prior to any development.

p. 141 - Outdoor furniture should be kept simple. Solar space heating is not needed if showers are eliminated. (Sattlers)

Response: The design of any new park furniture will reflect the character of the park. The department recommends showers in developed campgrounds as a public convenience. Solar water heating is used when feasible and has been used effectively in other state park system units since the late 1970's.

p. 141- Describe the park's water system, present and proposed. How much more water will be used? Is there enough water available? How will the increase impact the park? (Save Mount Diablo)

Response: See response to second question on p.131.

p. 142 - Save Mt. Diablo opposes spring development except as drinking water near the springs. How are hikers being protected from giardia and other contaminants? (Save Mount Diablo)

Response: The department has not planned any development near the park's springs except for those needed to allow them to be used as drinking water sources.

The significant reduction of livestock grazing in the park and control of feral pigs are the major steps to protect the public from giardia and other contaminants associated with animals in springs and other riparian areas. Drinking water has been and will continue to be treated to meet state and local health standards.

ENVIRONMENTAL IMPACT ELEMENT

General - The discussion of environmental impacts is not detailed enough. For example, what are the impacts of the proposed new water system? (Save Mount Diablo)

Response: General plans for State Park System units do not present detailed information on proposed developments. Detailed environmental analysis must be done later when the specifics of proposed developments, such as design and layout, are presented (see Preface, p. 150).

For a park the size and location of Mt. Diablo S. P., the development proposed in the general plan is modest. Facilities throughout the park will be rehabilitated or upgraded, but the major new facilities will be at widespread locations along the park's periphery. The chart in Table A (p. 144) can be used to compare existing with proposed facilities.

Table A shows, for example, that the number of family campgrounds will remain the same (one will be converted to day use, and a new one will be built). There will be 31 more developed family camping spaces for a total of 90 spaces.

Group camps will increase in number from 8 to 9, with an expansion of capacity from 230 persons to more than 315 persons - 125 added for the proposed camp for handicap persons, and 40 subtracted at Live Oak and Laurel Nook. A new group camp of unknown capacity is also proposed at the northeast campground site.

The number of public showers will increase from none to 5, while flush toilets will increase from about 8 to 17. The showers will incorporate low-flow design, and all new and replacement flush toilets will be water-efficient, unisex models. The number of picnic areas will remain the same.

The number of designated parking spaces will increase from 823 to 1078. The real increase in parking spaces will be less, because Table A does not account for the fact that some of the new, paved parking areas will take the place of existing informal parking areas (e.g., wide dirt shoulders).

p. 152 - Facilities such as campgrounds should not be constructed on steep slopes or canyons where debris flows are possible.

Response: All proposed sites will be reviewed by a geologist for geological hazards prior to development. Debris or sediment discharges are concerns of the department. Alternative sites will be reviewed and, if necessary, mitigation measures employed to minimize all adverse impacts.

p. 153 - The vast majority of water pollution from the Mt. Diablo Mine area is naturally-occurring and originates from the State Park. (Wessman)

Response: Acidic water contaminated with toxic heavy metals flows out of the mine and, eventually, enters the park via Horse Creek to Dunn Creek. The Department of Parks and Recreation has recently filed a formal complaint to the Regional Water Quality Control Board about this problem. The owner of the mine is currently under various orders from the Board to monitor and take actions to reduce the contamination. The Department of Parks and Recreation will participate by monitoring water quality on Dunn Creek.

p. 161 - Weekend and holiday traffic may be adversely affected by the general plan. The EIR should address these potential traffic impacts. (Caltrans)

Response: The general plan (p. 164) acknowledges that traffic generated by Mt. Diablo State Park will, in conjunction with other development, have a cumulative impact on traffic flow on local and regional roadways. Potential traffic impacts on these roadways were not discussed, however, because park-generated traffic occurs predominately on weekends and holidays, and we can find very little traffic data for these periods. Instead, we have done some additional traffic generation analysis using data gathered in the park.

Trip Apportionment

A 1986 survey of motorists in the park showed that about half of them were from cities in Contra Costa County, with most of the rest coming from other parts of the Bay Area. About 74% of the trips would likely involve Interstate 680 or State Route 24.

March is normally the busiest month for Mt. Diablo SP, and Sunday is the busiest day. The average number of motor vehicles in the park for Sundays in March 1988, was 1196 vehicles (range = 1020 - 1457). Based on the 1986 survey results corrected to reflect long-term traffic counts taken in the park, trips to the park are apportioned as follows (DPR counts vehicles only on entry to the park, so trip numbers are doubled to account for the return trip):

Trip Route	% of Trips	Number of Trips (X 2)
Via I-680 from south (enter at		
S. Gate/Macedo Ranch)	27%	646
Via I-680 from north (enter at		
N. Gate/Mitchell Can.)	20%	478
Via Route 24 to South Gate/Macedo		
Ranch	18%	430
Via Route 24 to North Gate/Mitchell		
Canyon	09%	214
Via local streets to North Gate/		
Mitchell Canyon	22%	526
Via local streets to South Gate/Mace		
Ranch	4%	096

Assuming that vehicles leave the park by the same route they arrive, the 'Sundays in March' Mt. Diablo State Park traffic on I-680 and Route 24 is compared with the 1988 average annual ADTs as follows:

MT. DIABLO STATE PARK TRAFFIC, SUNDAYS IN MARCH, 1988

Point on Route	Annual ADT	# Diablo Trips	% Diablo Trips
I-680 at Diablo Road I-680 between Ygnacio	118,000	1172	0.9%
Valley Rd and N. Main St. Rt.24 at Lafayette-	208,000	692	0.3%
Pleasant Hill interching	162,000	644	0.4%

Many assumptions were made in the above analysis, but the general relationships among trips should be correct.

Future Traffic Impacts

We assume that the number of trips to the park will increase 137% by the year 2000 (p. 159 of the general plan). The number of trips on an average day are expected to increase by about that percent.

However, the number of trips on peak days will be regulated more by park capacity - i.e., the number of parking spaces - than by annual trip numbers. The general plan calls for a build-out of 1078 parking spaces, including 201 campground spaces and 877 day-use spaces. Assuming each day-use space is used 2.5 times/day (some, such as at the summit, are used more; others, such as at Mitchell Canyon are used less), park capacity would be about 2400 vehicles (4800 trips) per day. This would be about 400 more vehicles, or 800 trips, than current maximums.

p. 163 - The Department of Parks and Recreation should contribute to improvements on Morgan Territory and Marsh Creek roads. (Wessman)

Response: Morgan Territory and Marsh Creek roads are county roads. The county often assesses developments that would generate significant new traffic for the costs of road improvements. To date the county has not requested the State to contribute to improvements on these roads.

p. 163 - Riggs Canyon is extremely visible from a distance. (Save Mount Diablo)

Response: The site of the proposed Finley Road terminus parking area is alongside the creek and can only be seen at a distance from points due south. The Riggs Canyon campground site is also next to the creek and is even more topographically protected, with high ridges surrounding it on all sides. Visual concerns will be taken into account when preparing plans for Riggs Canyon developments.

p. 164 - There are significant impacts to resources, e.g., water supply. (Save Mount Diablo)

Response: The upgrade of the existing water system on Mt. Diablo will not tap any new sources of water. The increase in water demand on this system from new toilets and showers will be offset to a large extent by water savings expected as a result of replacing leaky and wasteful old equipment with efficient new equipment.

The water requirements of the proposed new facilities are unknown at this point, as are the sources. The Environmental Impact Element (p. 154) proposes that the impacts of tapping local springs or aquifers be analyzed before these facilities are developed. With the upgrade of the existing water system, water conservation will be realized at the park (see second comment from p. 131).

p. 156 - Will the "livestock grazing management plan" be subject to public review? (California Native Plant Society)

Response: Although no decision has been made on submitting the livestock grazing management plan for public review through an EIR or Negative Declaration, the Department will consult with wildland ecologists and range specialists in developing the plan.

Map 1 - All maps should show the latest DPR and East Bay Regional Park District acquisitions in the Morgan Territory area. All current inholdings should be clearly shown. (Save Mount Diablo)

Response: The 631-acre Morgan acquisition and recent East Bay Regional Park District acquisitions will be included in the revised general plan maps.

The "Appropriate Future Additions Map" includes these specific properties you have referred to; the Diablo Ranch, Turtle Rock Ranch, and the Brumleve property. The former Boy Scout property is not shown as an inholding.

Map 3 - Map should show leased areas, tenants, fence locations, and sensitive areas (e.g., riparian zones). (Save Mount Diablo)

Response: This information is contained in the Resource Inventory of the Resource Element, which is available from the Diablo District Office in Concord and Resource Protection Division in Sacramento.

Map 5 - Add the Murchio grasslands and canyon as appropriate future additions. (Save Mount Diablo)

Response: These areas are being considered and if found to be appropriate, they will be added to the text and maps.

Map 6 - The Facilities Element should be considered separately from the rest of the general plan because there is not enough detail in it for informed

public comment. For example, the plan proposes a camping area at Laurel Nook but does not describe the fine development of bay trees there. (Save Mount Diablo)

Response: The department recognizes the conflicts with day use areas adjacent to overnight facilities. The Laurel Dell Day Use Area is adjacent to the Juniper Campground. In order to alleviate conflicts between these two areas, converting Laurel Dell to group camping is recommended.

Any major new park development or major change in an existing park development will require an environmental assessment.

The Facilities Element is an integral part of the general plan and is considered a part of the overall plan and cannot be considered separately.

Map 6 - The existing use areas shown in Mitchell Canyon are too large. (Save Mount Diable)

Response: The "Existing West Facilities Map" shows a general location of the Mitchell Canyon Area. The dashed lines around the arrowhead represent existing trails.

There is no proposed development that would obstruct views of the mountain from the existing developed use areas of Mitchell Canyon.

Map 7 - There is no residence in Donner Canyon. (Save Mount Diablo).

Response: As Table B- "Mount Diablo SP Structures" indicates, structure \$7 burned down in 1984 and was not rebuilt.

Map 10 - Save Mount Diablo supports public access through Curry Canyon, but not cars. (Save Mount Diablo)

Response: The department agrees that no public motor vehicles be allowed through the park's Curry Canyon trails.

Mount Diablo State Park

Comments Regarding Grazing Issues

Form letter A"

Mount Diablo Park Association

1981 North Broadway Suite 250 Walnut Creek, California 94596

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation Sacramento, CA 94296-0001

Re: The Preliminary General Plan for Mount Diablo State Park

Dear Mr. Doyle:

I am extremely concerned that eliminating cattle grazing from the Wildfire Protection Plan will increase the hazard to surrounding homes, wildlife, trees, and the natural resources of the mountain. The possibility of loss of human life also greatly increases when excessive fuel builds up, and any wildfire that starts is much house and more difficult to control. By rotating the herds among 17 fenced areas, cattle occupy only 6% of the park at any one time and reduce the fuel to the proper level before being moved. This kind of land management preserves the park and it's resources. Resource experts confirm that grazing management within the park is exceptionally good. Neither the Wildfire Protection Plan nor the Preliminary General Plan offer any substitute measures to prevent fuel buildup. I urge you to amend the General Plan to include cattle grazing as an integral part of the wildfire protection for Mount Diablo.

I also urge you to consider the historical significance of Diablo Ranch and it's unparalleled success in the Demonstration Ranch Program. As traditional ranching is displaced from the Bay Area, it is important to preserve a real working cattle ranch. The ranch has operated on this site since the early 1900's, is self-supporting, and provides extraordinary benefits to the park and the surrounding communities. I object to the suggestion that the public would be satisfied with a mini-rancho run by park personnel dressing up as vaquerros on weekends. I also object to the fact that my tax dollars would have to support it. I would like to see provisions included in the General Plan that insure the future of the Diablo Ranch Demonstration Program.

Additional comments:

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Safe grazing protects our mountain and our homes

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August, 1989

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

RE: THE GENERAL PLAN FOR MT. DIABLO STATE PARK

Dear Mr. Doyle:

We are extremely concerned that adopting the Mount Diablo General Plan as written, which eliminates cattle grazing from the park and provides no substitute to reduce fuel buildup, will increase the fire hazard to Blackhawk homes. We urge you to amend the plan to include cattle grazing as an integral part of the wildfire protection plan for Mt. Diablo.

Grazing is very important for reducing the amount of fuel in these highly productive grasslands. It reduces the intensity of wildfires and makes them easier to control. By rotating the cattle among several fenced areas, they occupy only a small part of the park at any one time and reduce the fuel to the proper level before the cattle are moved to another area. This type of land management preserves the park and it's resources.

We specifically would feel more comfortable knowing that our Blackhawk home is safer because cattle grazing is included in the fire prevention program. Diablo Ranch provides a service to the Country Club at Blackhawk Improvement Association by grazing the common open space, thus eliminating the expense of mowing hundreds of acres of grasslands near our homes. Without the ability to graze the Mt. Diablo leased lands, Diablo Ranch will not be in a position to graze our open space.

The San Ramon Fire Protection District looks favorably on grazing our open space as a means of eliminating the danger of fires. We feel that the State of California Department of Parks and Recreation should amend the General Plan to add grazing as part of wildfire protection for Mt. Diablo.

Sincerely,

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Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle,

Regarding the Preliminary General Plan for Mt. Diablo State Park, the checked comments best represent my opinions on the following issues:

Is grazing important for reducing fire hazards?

- [] Yes. Grazing is very important for reducing the amount of fuel in these highly productive grasslands, thereby reducing the intensity of wildfires. This can make the difference whether most of the oaks and other trees survive with only a minor scorching or are killed. It also reduces the damage to other resources, makes wildfires much easier to control, and greatly reduces the hazard to adjacent homes. The Wildfire Management Plan provides for many needed improvements, but it does not provide any practical way to limit the accumulation of excessive fuel in the grasslands if grazing were terminated. Grazing is thus a necessary complement to the Wildfire Management Plan.
- [] No. Grazing does not reduce the fire hazard at all unless the land is completely overgrazed. The Wildfire Management Plan takes care of all of the wildfire concerns.

Should grazing continue?

- Yes. These grasslands have been grazed for thousands of years. Among the many changes over the past 200 years, cattle gradually took over the role of the elk and antelope, and are now naturalized as part of the ever changing ecology. Removing all grazing animals would be a drastic change, and could be very detrimental to the resources. Resource experts confirm that grazing management within the park is exceptionally good, that any resource damage is very minor, and that damage claims by environmental activists are grossly exaggerated. Stopping grazing results in a mass of tall annual grasses and weeds, not native perennials. Only one third of the park is grazed, and cattle are normally in only about six percent of the park. Most people enjoy seeing the cattle and feel the benefits of grazing far outweigh any disadvantages.
 - [] No. Cattle are "unnatural" and do not belong in a state park.

 Cattle should be removed, and the grasslands allowed to revert to the native perennial grasses. Cattle cause widespread erosion, destroy native perennials and riparian vegetation, prevent oak regeneration, leave manure on trails, and pollute streams.

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Should the Diablo Ranch Demonstration Program continue?

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- Yes. This unique partnership of ppR and a ranching family evolved from the dedication and generousity of Angel Kerley who began hostin field trips for local school children over 17 years ago. It preserves the opportunity for present and future generations to visit a real working cattle ranch as traditional ranching is displaced from the bay area. The Demonstration Ranch is self-supporting, and provides extraordinary benefits to the park and the surrounding communities. There has been virtually no support for the proposed mini-rancho; it would be expensive, artificial, and a poor substitute for the real thing.
- [] No. The small number of people who visit the ranch does not justify committing one third of the park to grazing. The proposed new mini-rancho will adequately interpret ranching history.

Has the grazing issue been handled fairly in the General Plan process?

- [] No. The Planning Team has been extremely biased and obviously had their mind made up from the beginning to stop the grazing regardless of consequences. They have ignored the advice of resource and firefighting experts, downplayed and misrepresented the preponderance of support for continued grazing, tried to renege on long term committments made to Diablo Ranch, and made a sham of the public hearings. Many of the important environmental issues which have been raised are not addressed in the Environmental Impact Element or anywhere else in the Preliminary General Plan as required by CEQA.
- [] Yes. The Planning Team has responsibly and objectively considered all sides of this controversial issue and has based its recommendations on the best information available, DPR policies, and the desires of park users and the surrounding communities.

dditional Comments:

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	city & Zip LALAL T CAEEK, CA. 54595

P.S. Please forward a copy of this letter to the State Park Commission. Slso, please add my name to the mailing list for any future notices or information regarding the General Plan for Mt. Diablo State Park.

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Chairman and Members
The Park and Recreation Commission
Department of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296

Dear Commission Members,

I understand that the draft plans for Mount Diablo State Park have reduced cattle grazing in the State Park to 600 to 1000 acres which would support a new historically focused interpretive program. I am entirely in favor of limiting cattle grazing.

Mount Diablo State Park is not a commercial cattle ranch. Recently, it has become to look like one with the washboard tracks on the hills and the loss of many spring wildflowers. Sensitive riparian corridors have been seriously impacted by cattle.

Of concern to me is the regeneration of oak trees and native perennial grasses. Cattle grazing is a large factor in the loss of oak seedlings and the disappearance of the rich perennial grasses. It has been the policy of the State Parks to phase out grazing in order to protect and to restore the native biota.

Please help to return Mount Diablo State Park back to the people for recreation and the restoration of our beautiful native landscape.

Sincerely,

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ARKS & MECHEATIO

RE: Mount Diablo General Plan

James M. Doyle, Supervisor Environmental Review Section Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

The draft plan clearly demonstrated the very significant negative impacts of cattle grazing on the environmental and recreational resources of Mt. Diablo State Park. It calls for the elimination of commercial cattle grazing in the park, as is clearly required by law.

I strongly support the elimination of cattle grazing from the park. I also urge the Department to consider Wilderness Classification for a significant portion of Mt. Diablo State Park.

Signature

DEE E. WARENYCIA 104 STRATFORD COURT ROSEVILLE CA. 95661

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Form letter "F"

June 17, 1989

Manuel Mollinedo, Chairman and Members California State Park and Recreation Commission P.O. Box 942896 Sacramento, CA 94296-0001

Dear Commission Members:

We strongly support the General Plan for Mount Diablo State Park as prepared by the California Department of Parks and Recreation.

This plan would reduce cattle grazing from 7,500 acres to approximately 1,000 acres for a demonstration ranch which would be part of the park's interpretive program.

Livestock grazing can be very damaging to the native plants and animals that live on Mount Diablo. Grazing can lead to increased erosion, damaging both the topsoil and the watershed.

The presence of cattle and cattle fences is not compatible with the recreational uses of the park. People will not hike in fenced areas where cattle are present. They do not know whether fenced areas are part of the park or private property.

The value of grazing in suppression of fire hazard is exaggerated. Grassland must be grazed down to the mineral soil to prevent fires.

We are opposed to Mount Diablo State Park being used as a commercial cattle ranch. According to the Public Resources code, "Commercial exploitation of resources is prohibited in State Park System units." State parks are set aside to preserve outstanding natural resources and for recreational use and enjoyment of the public.

We urge that cattle be essentially removed from Mount Diablo State Park to allow the habitat to return to a natural condition.

Sincerely yours,

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Mr. James M Doyle, Supervisor Environmental Review Section State of California Department of Parks and Resources P.O. Box 942896 Sacramento CA 94296-0001

Dear Mr. Doyle,

I support the Sierra Club position on the Mount Diablo Preliminary General Plan. I support reducing grazing to no more than 1000 acres, removing all communications towers from the park, and the designation of appropriate parts of the park as wilderness.

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DIABLO RANCH 1453 Northgate Road Walnut Creek, California 94598

HEREFORD CATTLE

September 7, 1989

James Doyle
Environmental Review Section
Dept. of Parks & Recreation
P.O. Box 942896
Sacramento, CA 94296-0001
Dear Mr. Doyle,

During the spring of 1989, 177 individuals signed the enclosed petitions supporting grazing and the Demonstration Ranch in Mt. Diablo State Park. Upon learning that the Department of Parks and Recreation (DPR) was not counting petition signatures, it was decided that these petitions to DPR should be held up until this matter was resolved. The many people who signed these petitions (most of them local, with lots of first hand experience on Mt. Diablo) considered it grossly unfair for DPR to simply ignore their views -- particularly without laying out the groundrules in advance.

It is our understanding that DPR is required under CEQA to consider and respond to all comments received during the 45 day comment period on the Preliminary General Plan. We are therefore now submitting these petitions with the expectation and understanding that the views of these 177 people will not be ignored.

Sincerely,

Joan Kerley Brumleve

Enclosures:

24 petitions containing 170 signatures

SAMPLE PETITION PAGE

Stuart Hong
Mt. Diablo State Park
Planning Team
CA Dept of Parks & Recreation
P.O. Box 2390
Sacramento, CA 95811

Dear Mr. Hong:

The Mt. Diablo State Park Working Cattle Ranch interpretive program at Diablo Ranch is an asset valued by the community. Cattle ranching is a cultural heritage of this area, and the serene view of cattle grazing on the hills adds to the enjoyment of Park visitors. Continuation of grazing is not only vital to the survival of the Demonstration Ranch, but is also very important for the reduction of fire hazards which would otherwise be much more severe on Mt. Diablo and for surrounding homes.

We urge the continuation of the Demonstration Working Cattle Ranch and grazing on Mt. Diablo.

<u>Date</u>	Name	Mailing Address	Phone
4-17-8 4	David Cooney	P.O. Box 652 Clayton, Ca.	672-9454
4-17-89	CAROL COONES	P.O. Box 652 - CLAYTON, CA	672-9454
4-17-89	MARIE PASTER	P.O. Box 286 Clay Tow	622-6 NY
4-17-89	Lyn Ginoctio:	Rt 2 Bry 169 Brentwood	634-1572
4-17-89	John P. Linches	Etz Buf 169 Breen/wood	634-1572
4-17-89	EDWIN M.ERK	ICSON 2001 DEMMIS ANTIOCH	
4 17 89	Jeff Machab	1759 Sharon Dr Concord	6853885
4-17-89	Philip Brun	0 61 Lodge Dn.	825-899:
141-89	Helen Llyn	13/3/ Santa Paula	682-684.
4-17-89	Jina Romies	71 W. 904 ST. PITSEURS	13 2-404
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1560 CATALINA LIVERMORE, CALIFORNIA 94550 TELEPHONE (415) 447-0749

Mr. Stuart M. Hong State of California Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001 September 11, 1989

Subject: Preliminary General Plan-Mt. Diablo State Park

Dear Mr. Hong,

Thank You for the opportunity to provide comment on the preliminary general plan for Mt. Diablo State Park. We have reviewed the plan and have the following comments on views which are presented relating to livestock grazing, range maragement & improvements, and fire control there. The goals of the California Department of Parks and Recreation for Mt. Diablo do not appear to include livestock grazing.

To indicate that past grazing at Mt. Diablo has degraded the natural, physical, and esthetic environment of the area is somewhat inappropriate and shortsighted. There appear to be no documented case studies showing detrimental effects of cattle grazing to the resources of Mt. Diablo State Park. Pather than completely eliminating the option of using grazing as a management tooi, we recommend that the plan further explore the many benefits of proper, planned grazing and appropriate livestock management practices.

Controlled livestock grazing has long been recognized as an effective tool in managing grassland ecosystems for both annuals and perennials. Numerous perennial grasses currently exist in the area. Research indicated that through a proper grazing program it is possible to effectively manage for perennial grass stands and actually enhance them. The critical factor is timing of grazing and the degree of use an area receives.

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The plan states that the replacement of native perennial bunchgrasses with introduced annual species as a result of livestock grazing has resulted in an increased fire hazard in the Park. It is important to point out that although perennials do have a longer green period, in the Mediterranean climate that exists here, these also go into a period of semi-dormancy during the part of summer when fire danger is high. During this time perennials may very well not be less flammable than annual grass species.

It is also a matter of opinion, and of no scientific basis, that controlled burning is more effective than controlled grazing as a method of preventing wildfires. Vegetative overgrowth and associated fire hazard are concerns that are better addressed through a combination of both grazing and controlled burning. Total elimination of the grazing component following implementation of the proposed Wildfire Management Plan would result in an increase in brush and a less effective fire control program. Fuel breaks and controlled burning practices alone will not be adequate.

The plan states that the presence of grazing has altered the esthetic and recreational values of the Park unit. The incompatibility of livestock and tourists however is a judgement which is not well documented. Through proper planning and use of Park resources, the negative impacts of this potential conflict could be minimized without excluding either.

Existing range improvements such as ponds, springs, and other water developments should be evaluated as to the overall benefits they provide prior to removing them, as indicated, to restore the "natural landscape" of an area. Construction techniques for the establishment of esthetically pleasing water improvements are available. These could be used to improve the existing visual character of systems already in place. The section on hydrology in the plan indicates that spring developments reduce or eliminate surface water now available to animals. It makes no mention that water developments can actually provide significant benefit to wild-life habitat conditions as they have on both public and private lands throughout the western United States. Water developments are also relatively expensive to install any that are eliminated may be difficult to reestablish if later it is determined that they were desired or necessary.

Water quality degradation as a result of livestock concentrating riparian areas was cited as an existing

problem in the Park. This could be minimized by identifying critical areas and controlling the season and degree of their use. Again, total elimination of livestock to solve a potential problem may not be necessary.

Finally, in determining the overall management of the resources of Mt. Diablo State Park, it is vitally important that a coordinated resource management process be used to evaluate the overall ecosystem and resource needs of the area. We recommend that an interdisciplinary team made up of resource specialists be assembled to outline a compatible longterm resource management program. This would maximize the use of the area while also providing for its ultimate protection and enjoyment by the public.

Thank You again for the opportunity to provide comment.

Sincerely,

Anthony Santos

Director of Planning

United States Soil

Agriculture Service

2121-C 2nd Street, Suite 102 Department of Conservation Davis, CA 95616-5475 (916) 449-2854

September 8,1989

Mr. James Doyle Dept. Parks and Recreation PO Box 2390 Sacramento, CA 95811

Mr. Doyle,

I have been asked by the Contra Costa Resource Conservation District to review the Preliminary Plan for Mount Diablo State Park. The plan is well written and a very thorough document, however, there are some technical aspects that I feel should be corrected.

These technical inadequacies are embodied best by the last paragraph on page 56. It is highly unlikely that complete removal of grazing will improve the cover of native perennial bunchgrasses. We have found that competition with annual plants for soil moisture is the primary limiting factor in expression of perennial grasses that still have root crowns. If root crowns are not present, it is even more unlikely that native perennial bunchgrasses can establish from seed in a matrix of annual grasses. Our experience in management has shown that the most effective way to increase the perennial component is with very specific designed grazing systems. Our field technicians are well qualified to assist in this.

Productivity of native perennials and annual grasses (native or exotic) is approximately equal on an area basis. In fact, productivity of perennials may be slightly greater than that of annuals in deeper soils because of a more extensive root system. Additionally, fine fuel of perennial grasses and fine fuel of annual grasses is about equal in terms of flammability. The primary fuel factors that influence fire behavior (continuity, amount, and moisture content) differ little.

Standing crop of both annual grasses and perennial grasses peaks at about the same time, no matter what the species composition. Peak standing crop is mainly a function of temperature and precipitation.

I disagree strongly that grazing as a means of fuel load reduction is ineffective. Fuel load reduction by grazing is

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the central element in many of the public land management agencies resource plans.

Page 58 (Ground Squirrels) contradicts somewhat the concepts developed on page 56. The patchy appearance of the vegetation generated by grazing seems to me to be an excellent tool for the habitat manipulation desired to reduce ground squirrel numbers.

The jury is still very much out on the effects of livestock on oak regeneration. There are two very valid sides to this argument and both should be stated whenever one is cited.

Many of the problems cited as livestock generated are indicative of large grazers in general. For instance, grazers gather at water no matter what their level of domesticity. Nutrient loading of streams, soil compaction, and excrement are characteristics of all grazers, not just cattle.

While I realize that livestock grazing on the State Parks is a political decision, I feel that the technical aspects of management plans should be of the highest quality. I hope my comments will help you to improve the quality of this and future reports. I am available for assistance if you so desire.

Sincerely,

Joel Brown, PhD

State Range Conservationist

cc: Contra Costa Resource Conservation District.

USDA Soil Conservation Service 1345 Main St. Red Bluff, Calif. 96080

September 6, 1989

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation P.O. Box 942896 Sacramento, Calif 94296-0001

Dear Mr. Doyle:

The Contra Costa Resource Conservation District has asked me to provide technical comment on the Mount Diablo State Park Preliminary General Plan dated April 1989.

By way of introduction, I provide technical assistance to 25 Soil Conservation Service offices in northern California, as far south as Alameda County. My formal education includes a B.S. in Wildlife Management and M.S. in Biology. My particular technical strengths are in site potential, grazing management, restoration of annual grasslands to perennial grasslands, and managing resources (natural, human, financial) holistically.

I appreciate the tremendous thought and work behind the Preliminary General Plan. It reflects quite well on your department. I'll restrict my comments to livestock related issues.

Livestock in the environment are neither good nor bad. Goals must first be established before we can judge whether their presence will move us toward your goals or away from them. Like throwing a rock into a pond, livestock will have ripple effects in the ecosystem. Will the ripples move us toward or away from our goals?

Permit me to abstract the goals. Protecting and preserving historic, cultural, soil, water, and biologic resources while moving toward more pre-European settlement vegetation conditions appear to be the major landscape goals for the currently grazed portion of the park. Will livestock grazing move us toward or away from these goals?

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I view livestock as a double-edged sword. We can list SEP 1 1 1989 the ways that livestock can damage soils, plants, communities, and ecosystem functions. In fact these are

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well described throughout the General Plan, particularly well enumerated on pgs. 60-62. But we can also prepare a list of the ways that livestock can benefit and sustain soils, plants, communities, and ecosystem functions. As a training exercise, I frequently ask our SCS employees to prepare such lists. The list of ways that livestock can be beneficial is often the longest. These benefits have not been given adequate recognition in this plan.

Before highlighting some of those benefits which would move the park toward its goals, I have a few comments on the negative impacts as presented in the report.

- 1. pg 28. "Due to widespread livestock grazing...large stands of native perennial grassland are not found...". Having toured the park several times over the past seven years, I would have to disagree. I was very much impressed with the quantity and quality of perennial grass stands present. I have personally advised Mr. Tom Brumleve, the grazing concessionaire, on grazing strategies to improve the health, vigor, and reproduction of perennial grasses. In my opinion, his resultant changes in grazing managagement in recent years have shown very positive results. It is not difficult to find purple needlegrass seedlings near parent plants. When I judge the age structure of these stands, I am very pleased with perennial recruitment.
- 2. pg 28. "Perennial species occur primarily in areas which are not grazed." I was unable to find any signficant areas in the grazed part of the park which did not have some level of perennial grasses. Nor did I find a negative correlation between livestock presence and perennial grass presence.
- 3. pg 53. "Replacement of native perennial bunchgrasses with introduced annual species, a situation which is perpetuated by livestock grazing...". Again, I think evidence in the field points to increasing perennial grasses where livestock grazing is adjusted to meet the needs of perennials. Where is the evidence for such conclusions?
- 4. pg 60. "...livestock seasonally browse oak seedlings, preventing recruitment into the oak populations." While livestock may do this, there is a general and widespread oak regeneration problem throughout California, not just in the park, including areas not grazed by livestock. On the other hand, some regeneration examples can be found in grazed areas on the park. And how is deer browsing damage (and other animal damage) differentiated from livestock damage?

I would like to highlight a few of the potentially very beneficial ripple effects of livestock grazing in the park to achieve some of the stated goals:

- 1. Danger and damage from lack of grazing.
- a. In some environments, lack of disturbance may result in advancing succession, increasing diversity and stability, and achieving goals for a particular use. However, in many of our environments such as those on Mount Diablo, excessive rest may move you away from goals. Excessive rest tends to allow excessive old standing thatch to accumulate in perennial bunchgrasses to the point of reducing vigor and reproduction and may even kill bunchgrasses. Fire could overcome this but has a number of disadvantages for such a large area with adjacent properties, erosion and flooding hazards, wildfire hazards, and high costs.
- b. The main competition between the exotic annuals and native perennial grass seedlings is for sunlight. Grazing, if properly controlled, can reduce shading from relatively more rapidly growing annuals and allow much greater survivorship of perennial seedlings. Fire cannot directly benefit perennial grass seedlings competing with the tremendous seed source and rapid growth of annuals, but livestock can.
- 2. Livestock present a powerful tool to manipulate succession in desired pathways. Livestock can be used to prepare seedbeds, plant and cover seed, and provide a firm seedbed. Stock can be utilized to control brush, create firebreaks, and control noxious weeds.

In summary, livestock can be used as a tool to manipulate the plant communities toward desired landscape goals. Stock can maintain perennial grass vigor, enable and/or accelerate succession toward perennials, and provide other special use manipulation of vegetation toward goals. If grazings are planned, monitored, controlled and replanned as necessary, the positive effects of livestock can move you toward your goals and the negative effects can be minimized or mitigated. To accomplish the stated goals on Mt. Diablo without livestock is likely to be prohibitively expensive on Mt. Diablo at best or impossible at worst.

Other miscellaneous comments on the Preliminary General Plan:

1. pg. 51 "A secondary objective shall be to restore and perpetuate the native plant communities that prevailed in the area prior to Euroamerican influences." pg. 53 "The goal shall be to restore native grasslands in the park." It is neither possible nor practical in most instances to eradicate exotic naturalized species from the park, especially in the herbaceous component where annuals

currently predominate. I believe that these exotics can largely be reduced in prominence by increasing native perennial grass composition, but relatively few can actually be eliminated from the park. The goal should read something like "to the extent practical".

- 2. pg. 56 "The native perennial species that once dominated California's grasslands produce much less on a yearly basis than annuals...". I have never seen evidence to support this claim. From my studies and experience, perennial grass production can equal or exceed annual grass productivity.
- 3. pg. 56 "...grazing cannot be relied on as a management tool for reduction of fire hazard." I see no reason why not. There are a number of alternative strategies for fire hazard reduction using livestock. And many of these would be environmentally much less disruptive to natural ecosystem function and aesthetics. All that is required is sound planning and execution.
- 4. pg. 57 "...perennial bunchgrasses, which are less flammable than exotic annuals...". In hazardous fire conditions (prolonged dry conditions with or without winds), I doubt there is any functional difference between annuals and perennials. Many of our perennials get just as dry as the annuals.
- 5. pg. 60 "State Park System policy and philosophy, and enabling legislation, mandate that state parks be managed by the department with a primary purpose of restoring, protecting, and maaintaining native environmental complexes and indigenous flora and fauna." "...livestock grazing...is generally incompatible with state park management objectives." In my professional opinion, livestock present a powerful, practical too! to achieve the stated management objectives. If grazing planning eliminates the negative ripple effects of livestock and takes advantage of the positive ripple effects, I suspect that the park would find livestock are not only a legitimate tool to consider using in order to accomplish objectives, but when considered from the park budget perspective and environmental impacts, livestock may also represent the best tool available to create and maintain healthy native perennial grasslands and related landscape goals.
- 6. Throughout the Preliminary General Plan, livestock are presented as detrimental to park objectives. I find little evidence of livestock grazing being viewed objectively as a potential management tool to achieve goals. This lack of balance is often the result of inadequate technical input in the planning process. I would recommend the park establish a technical advisory committee consisting of people representing relevant concerns and expertise to look more

objectively at grazing as a possible tool to achieve park goals.

- 7. The aesthetics issue of whether livestock are enjoyed or despised by park visitors is a difficult one. Certainly, the diversity of people and opinion covers the entire spectrum and I'm curious to know what the actual numbers of each are. For example, are those whose visitation experience is ruined by livestock presence a minority or majority? To what degree? How does that compare with those who enjoy the animals? If livestock were deemed to be beneficial and desirable to achieve landscape goals, couldn't any negative visitor impacts be mitigated by restricting stock to a small portion of the park at any given time? After visiting Mt. Diablo a number of times, it seems the park is more than large enough to accommodate livestock (if desired to accomplish objectives) and people who hate livestock.
- 8. The Preliminary General Plan outlines policies and goals which identify directions rather clearly, but the specifics are rather obscure. It would appear that to develop all the specific inventories and plans, and conduct all the studies and improvements, and provide all of the necessary maintenance, etc., I suspect the entire state park budget would not even begin to provide financial resources to actually achieve the goals. And some of the goals, as commented on above, are not even achievable. Are costs to carry out these policies developed and available?

Again, I want to commend you for the work that has gone into this Preliminary General Plan. The staff and leadership involved clearly demonstrated their desire to protect and enhance the park. Yet I would urge you to reconsider the potential role of livestock to achieve park objectives. This is a tool which has legitimate ecologic and economic potential for Mt. Diablo and should not be so underestimated.

Sincerely,
Ruhard of King

Richard J. King

Area Range Conservationist

cc: Phil Blake, Concord F.O.
Bob Nuzum, Contra Costa Resource Conservation District
Denis Nickel, Santa Rosa Area Office

COOPERATIVE EXTENSION UNIVERSITY OF CALIFORNIA

Agronomy and Range Science Extension September 7, 1989

Department of Agronomy and Range Science Davis, California 95616

75.2-3457

Mr. James Doyle, Supervisor Environmental Review Section California Dept. of Parks & Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

I disagree with the planned reduction in livestock grazing on Mt. Diablo State Park. The livestock manager has exhibited enlightened and intelligent management of the grazing resource and contributed to statewide resource management objectives.

Flammable vegetation, such as that on Mt. Diablo, is a wildfire hazard, but this hazard can be reduced through grazing management. The destructive potential of wildfire on Mt. Diablo was unleashed in 1977. The consequences included loss of a beautiful stand of mature blue oak that could have been preserved except for Park management policy; the mostly herbaceous understory, by policy unmanaged, generated sufficient heat energy to destroy the trees.

The threat of wildfire will increase within the Park if current livestock grazing is curtailed. As a result, the citizens of California will suffer in three ways. First, there will be additional losses of Park resources. Damage from intense and uncontrollable wildfire will degrade public values and detract from the experience of a visit to the Park. Because Park management is subsidized by revenue, a perception that mismanagement contributed to loss of public resources could generate reaction among legislative constituencies.

Impact of wildfire originating in the Park may extend beyond its boundaries. Subdivided private lands near the Park are at risk from spread of a Park fire. In the adjacent urban area, the loss could be in the tens of millions of dollars, including costs of fire suppression. Attempts to recover these losses from the Department of Parks and Recreation may result if mismanagement is suspected to be a contributing factor.

Finally, wildlife and the public's enjoyment of it, will suffer in the event of wildfire in the Park. The impacts of wildfire on wildlife habitat are well documented. Fire used as a management tool can enhance habitat and, together with grazing, reduce the threat of wildfire. However, unmanaged park vegetation will, eventually, result in an intense conflagration that may irreversibly alter habitat and limit park management options.

Sincerely,

Theodore E. Adams, Jr.

Extension Wildlands Specialist

SEP 1 1 1989

RPD

TEA/nm

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cc: The Honorable George Deukmejian

University of California and the United States Department of Agriculture cooperating.

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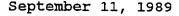
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Mr. James M. Doyle, Supervisor Environmental Review Section



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Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:
Gerti B. Thomas

I have reviewed the General Plan for Mt. Diablo State Park and am concerned with some of the allegations made and policies that may be implemented. It is my contention that livestock grazing is providing the park with more benefits than liabilities.

First, I wholeheartedly agree with your vision of returning the mountain to its native state. I can think of nothing more pleasant than watching elk feed in a grassland dominated by perennial bunchgrasses. Unfortunately, this does not appear to be a realistic goal. The elk have long since been replaced by picnic tables, roads and people. Natural wildfire is not an acceptable alternative for homeowners living on the boundaries of the park. It is apparent that a compromise between what is desired and what is practical and possible must be reached.

I would like to address five issues that were not adequately discussed in the Mount Diablo State Park Preliminary General Plan:

- 1) Perennial bunchgrass establishment
- 2) Possible invasion of grassland by brush
- Dietary overlap of cattle and deer
- 4) Effect of grazing on soil
- 5) Grazing and fuel management

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James M. Doyle September 11, 1989 Page Two

The Mount Diablo State Park Preliminary General Plan (hereafter referred to as the MDSPPGP) indicates Park Staff's desire to return the park to its native vegetative state. The method through which Staff proposes to do this is extremely hazy. states that "Replacement of native perennial bunchgrasses with introduced annual species, a situation which is perpetuated by livestock grazing has increased fuel loading and fire hazard in both grassland and woodland understory" (General Plan, 1989). This statement implies that removal of grazing livestock will cause the annual grassland to revert to one of perennial dominance. Permanent transects at the Hopland Field Station failed to show an increase of <u>Stipa pulchra</u> over twenty years of protection from grazing from livestock (Bartolome and Gemmill 1981). Hillyard and Bartolome (1982) noted that on Mt. Diablo none of the native grasses occur in very large proportions, even in areas undisturbed by grazing. Work done by White (1967) on the Hastings Reservation failed to show an increase in S. pulchra in an ungrazed situation. Work done by Bartolome and Gemmill (1981) indicates that <u>S. pulchra</u> is an opportunist and thrives under disturbance (grazing, fire, etc.). Current research findings show that no increase in <u>S. pulchra</u> populations may be expected when grazing is excluded from the grassland.

The encroachment of grasslands by brush is a problem that could become realized by the removal of grazing livestock. Without a doubt the value of grassland for recreation purposes is greater than that of dense brush. Work done by McBride and Heady (1968), on land owned by East Bay Regional Park, showed the average expansion of baccharis onto grassland to be 1.3 feet/year. Brush encroachment enveloped an additional 517 acres of Tilden Regional Park from 1927 to 1963 (14 acres/year). McBride and Heady (1968) found livestock to be effective in limiting the invasion of grasslands by Baccharis pilularis. When East Bay Regional Park District acquired Sunol Regional Park limited grazing permits were established in an effort to prevent brush invasion (McBride and Heady 1968).

Several comments made in the MDSPPGP regarding the competition for similar forage resources by deer and cattle are difficult to substantiate. While cattle and deer are both ruminants they utilize different grazing strategies. Van Soest (1982) partitions

Continued

James M. Doyle September 11, 1989 Page Three

ruminants into three groups, concentrate selectors (deer), intermediate feeders (moose) and bulk and roughage selectors (cattle). Concentrate selectors cannot tolerate large amounts of fiber in their diet and are thus limited to selective feeding on concentrates and low fiber portions of plants. The bulk and roughage eaters are adapted to utilize cell wall components. Soest (1982) also noted that animal size relative to plant size is a factor affecting ability to select. Thus a small herbivore (deer) can more easily sort the parts of a relatively small plant. Thus a small herbivore The rumen-reticulo and abomassum arrangement is unique to the concentrate selectors (deer) and differs from that of the roughage eaters (cattle). Work done by Woodis (1989) on the Sheldon National Wildlife Refuge further demonstrates the different feeding strategies used by deer and cattle. It has been suggested that browse use by cattle has improved the quality and quantity of feed for white tail deer. There is little evidence that is able to substantiate that a significant amount direct competition between deer and cattle for feed resources occurs.

The MDSPPGP makes frequent mention of damage done to the soil resource by livestock. Staff indicates that increases in soil compaction, and decreases in infiltration are the result of cattle grazing. Data collected on the Edwards Plateau of Texas (McCalla et al. 1984) lists bulk density, grass standing crop, bare ground and rock cover as the most important variables influencing water infiltration. The greatest infiltration rates were maintained in the moderately stocked continuously grazed pastures. This data strongly suggests that watershed condition can be maintained or improved under a moderate continuous grazing system. Work done by McGinty et al. (1979) on the Edwards Plateau shows similar infiltration trends between areas excluded from grazing and a Blackburn (1983) notes four pasture rotational grazing system. that available information on the hydrologic impacts of light or moderate grazing intensity strongly suggest that there are few hydrologic differences between pastures continuously grazed lightly or moderately. Knowledge as to the effects of grazing and grazing systems on the soil resource in California is extremely limited. Work done by Liacos (1962a and 1963b) in the clayey hills east of Berkeley show only modest increases in soil bulk density when ungrazed sites were compared to sites that were grazed moderately. Work done by Assaeed (1982) on the San Joaquin Experimental Range showed no difference in bulk density on grazed and ungrazed slopes (Ahwahnee sandy loam). Howard et al. (1981)

Continued

James M. Doyle September 11, 1989 Page Four

list organic matter, soil-water characteristics, sand content and iron as the most important multiple regression variables when determining soil compaction factors. Heady (1966) found that the removal of late-summer dry plant residue reduced herbage production as well as increased bulk density of fine sand loam with clayey subsoils. Bulk density is lower under blue oak canopies than in natural openings (Kay and Leonard 1979) following 14 years of protection from deer and cattle grazing at the Sierra Foothill Range Field Station. Soil bulk densities on adjacent sites where oaks were removed 14 years previously became as compacted as those in natural openings. These results indicate that the oak canopy and oak litter may provide protection from raindrop impact and provide for increased soil organic matter and more porous soil structure.

The data cited indicated that under a moderate grazing regime, the most important factor influencing soil compaction is organic matter. This organic matter can provide the soil protection from the mechanical effects of raindrop impact. Clawson et al, (1982) recommends incorporating residual dry matter standards as an effort to assist in the management of the soil surface.

The MDSPPGP indicates that grazing livestock has impact on fuel loading on annual grasslands. Through use of controlled grazing Mount Diablo State Park could strategically graze out areas where the possibility of damage (by fire) to life, limb or property exists. Livestock grazing provides an economical way to reduce volatile grass fuels within the Park. I could not hazard a guess as to the cost of reducing these fuels mechanically nor is controlled burning going to provide a feasible method of reducing fuel on all of the park grasslands. The spring developments and stocktanks, in addition to providing alternative water sources for wildlife could be used to provide firefighters with quick access to additional water in a wildfire situation.

In conclusion, I hope for a better solution. The evidence that is presented by Staff does not accurately represent research findings. Scientific evidence does not support the supposition that a perennial grassland community will dominate the grasslands of Mt. Diablo upon the removal of livestock. The removal of livestock will not return an abundance of healthy deer to the park. The relationship between responsible livestock grazing and the soil resource is not well known in California. Staff referenced several of the same publications that I did. We both

Continued

James M. Doyle September 11, 1989 Page Five

drew different conclusions. This fact, in and of itself should indicate to you how limited the value of this information really is. Surely work that was done on the Edwards Plateau of Texas with its different climate, precipitation patterns, soil and vegetation cannot be applied to the annual grasslands of California. The effect that cattle grazing has on fuel loading should be so obvious that it need not be addressed. I look to you to read the MDSPPGP and endorse the parts of it that are well done and would benefit the visitors of the Park. I also expect you to recognize problems and biases within the MDSPPGP and consider alternatives within the bounds of economical and biological reason. An alternative might be to renew the grazing lease for another 10 years and implement some studies to determine the effect of grazing on the Park resource. Use this opportunity to become a leader in resource management!!!

If I may be of any assistance to you or Staff, please do not hesitate to call me. I look forward to working with you in the future.

Sincerely,

danny a Forence

Larry C. Forero Livestock, Range and Land Use Advisor

cc: Fisk Phelps, County Director
 Gerti B. Thomas, County Director
 W. James Clawson, Range Specialist

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BOARD OF SUPERVISORS CONTRA COSTA COUNTY

September 11, 1989

ROBERT I. SCHRÖDER SUPERMSOR, THIRD DISTRICT

Mr. James M. Doyle Environmental Review Section Department of Parks and Recreation Post Office Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

The following summarizes the main points that came out of our meeting on the Mount Diablo State Park Wildfire Management Plan, on Thursday, September 1989:

- 1. All of the Chiefs feel that the Wildfite Management Plan will adequately protect the homes in the surrounding communities,
- 2. While the Chiefs recognize that it is the prerogative and responsibility of Department of Parks and Recreation to decide whether grazing should continue, they still feel that grazing would be a valuable complement to the Wildfire Management Plan.
- Nanagement Plan

 3. The Edmeowner representatives fair strongly that grazing should continue as a complement to the Wildfire Management Plansagement
- 4. The Chiefe stated wildfires would no doubt take a heavy toll on the oak trees if grass is allowed to accumulate, but it is clearly Department of Parks and Recreation's responsibility to balance this against their other resource concerns.

Mr. James M. Doyle September 11, 1989 Page -2-

If any of the attendees feel this is not accurate please let me know.

Sincerely

Robert Y. Schroder, Supervisor

District III

RIS:sac

CC: Chief Bill Maxfield, Consolidated Fire
Chief John Eliff, CA Dept. of Forestry
Richard J. Clanton, Ranger Unit Chief CDF
Chief Melvin Deardorff, San Ramon Fire Prot. Dist.
John Clary, Assistant Chief for Bastern Diablo Fire Dist.
Chief Steven Epplier, Tassajara Fire Dist.
Rick Matthews, Representing Blackhawk Area
Tom Brumleve, C. C. Resources Conservation Dist.
Felix Arteaga, Dist. Superintendent-Dept. Park/Rec. Concord
Matt Mattson, Councilmember for City of Walnut Creek
Dave Beatty
Bill Shockley
Gene Anderson
(Letter distributed to all of the above)

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September 11, 1989



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Mr. James Doyle, Supervisor Environmental Review Section State of California Dept. of Parks and Recreation P. O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

On behalf of the California Cattlemen's Association membership, I want to emphasize our strong support for continued livestock grazing on Mt. Diablo State Park at the present level.

The Diablo Ranch, operated by the Tom Brumleve family, has functioned as both an outstanding demonstration for the general public's enjoyment and as a viable ranching operation, whereby the State can earn revenue from sound ranch management of the overall park. If the Mt. Diablo State Park Preliminary General Plan is adopted in its current form, that revenue will be lost and all costs for managing the park will fall on the Department.

Further, if livestock grazing is severely curtailed, as proposed in the general plan, local residents will be subject to greatly increased fire hazards, a fact that fire control experts have expressed time and again at meetings and in letters on the general plan. The general plan does not recognize the significant contribution of livestock grazing to fire control and puts the Department in the position of being potentially liable for damages to private property for failure to adequately control wildfires on Mt. Diablo.

We also cannot accept the Department's allegations that livestock grazing deprives wildlife of forage and habitat and destroys oak and other plant species on Mt. Diablo. The Department has failed to acknowledge numerous testimony to refute these allegations.

RECEIVED The Brumleve family has indicated their willingness to work with the Department as new park areas are developed for recreational use. If the SFP 1 1980 rtment would only acknowledge the concerns of the Brumleve's relative to maintaining an economically viable operation, the Park would benefit RPD from the revenue from the ranch as well as the public value of the demonstration ranch.

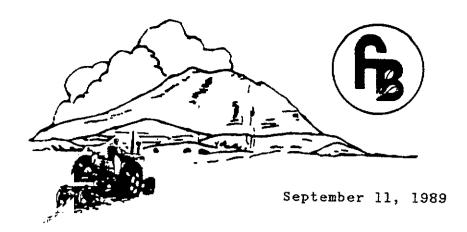
Mr. James Doyle September 22, 1989 page 2

We respectfully request that the Mt. Diablo Preliminary General Plan be revised to strike a reasonable balance of resource use on Mt. Diablo - one that recognizes the Brumleve ranch as a significant asset to the recreational and educational experience of park users and reduced fire hazards to adjacent property owners, and at the same time allows the Brumleve's to maintain an economically viable operation. We hope you will consider our views and thank you for this opportunity to comment.

Sincerely

Myron Openshaw

President



CONTRA COSTA COUNTY FARM BUREAU

5554 Clayton Road Concord, California 94521 Phone (415) 672-5115

Mr. James M. Doyle, Supervisor Environmental Review Section Dept. of Parks & Recreation Sacramento, CA 94296-0001

Dear Mr. Doyle:

The Contra Costa County Farm Bureau is extremely concerned that eliminating cattle grazing from Mt. Diablo will greatly increase the fire hazard to adjacent homes. Grazing is very important for reducing the amount of fuel in these highly productive grasslands, thereby reducing the intensity of wildfires and making them much easier to control. Resource experts confirm that grazing management within the park is exceptionally good. By rotating the herds among 17 fenced areas, cattle occupy only 6% of the park at any one time and reduce the fuel to the proper level before being moved. This kind of management protects the oak trees and other natural resources. Most of all, we feel more comfortable knowing that homes are safer because of this natural fire protection. Neither the Wildfire Protection Plan nor the Preliminary General Plan offers any other practical way to reduce fuel build-up. I urge you to amend the General Plan to include cattle grazing as an integral part of the wildfire protection for Mt. Diablo.

We also urge you to consider the historical significance of Diablo Ranch and it's Demonstration Ranch Program that is so highly valued by the local communities. As traditional ranching is displaced from the Bay Area, it is important to preserve a real working cattle ranch. The ranch dates back to the first settlers. It is self-supporting, and provided extraordinary benefits to the park and the surrounding communities. We object to the suggestion that the public would be satisfied with an artificial mini-rancho run by park personnel dressing up as vaqueros on weekends. We also object to the fact that our tax dollars would have to support it. We would like to see provisions included in the General Plan that insure the future of the Diablo Ranch Demonstration Program.

Sincerely,

RECEIVED

Gerald Dinelli, President

SEP 1 5 1989

CONTRA COSTA COUNTY FARM BUREAU 379

RPD



DIABLO RANCH 1453 Northgate Road Walnut Creek, California 94598

September 7, 1989

HEREFORD CATTLE

James Doyle Environmental Review Section Dept. of Parks & Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle,

Please accept the following as my comments on the Preliminary General Plan for Mt. Diablo State Park. My overall impression is that the Plan is essentially unchanged from the elements initially presented by the Department of Parks and Recreation (DPR) staff at the five public meetings. It has become obvious that the planning team was set on eliminating grazing and the Demonstration Ranch from the outset, and that the five public meetings were only a sham. The Plan simply reiterates the "positions" held by the DPR planning team and it is still glaringly deficient in justifying those positions. It shows an arrogant disregard for the preponderance of public support for continued grazing and the Demonstration Ranch expressed in correspondence to DPR and at all five of the public meetings. It also fails to address the environmental impacts of the drastic changes proposed by DPR, and it does not identify or evaluate alternatives as required by the California Environmental Quality Act.

In previous correspondence I have raised numerous issues to which DPR has still not provided a substantive response and that are not adequately addressed in the Preliminary General Plan. Rather than reiterate those comments and concerns, I am hereby resubmitting and incorporating these previous comments (as attachments) with the understanding that DPR will now be required under CEQA to respond in depth to each comment.

I am also resubmitting the Joint Letter from Forty Organizations (which included Diablo Ranch) dated February 21, 1989 (Attachment 4). Although this letter expressed the common views of an extremely large local and statewide constituency, DPR has never provided anything more than a very cursory response, and the recommendations have been ignored. All of the comments and recommendations remain applicable to the Preliminary General Plan. I therefore request that DPR now seriously consider and respond in depth to the comments and recommendations set forth in this letter, and ammend the Preliminary General Plan accordingly. In particular, note the recommendation to ammend the Declaration of Purpose.

In a meeting May 9, 1989, with Director Agonia, one of the topics discussed was a Cost Analysis which estimated the nature and magnitude of the major adverse impacts likely to occur if grazing is terminated (see Attachment 2). This study indicated that there would be a tremendous loss of trees, other damage to park resources, and the potential loss of homes and other impacts on the surrounding

RECEPPENTUNITIES resulting from unusually intense wildfires caused by

excessive fuel accumulations. It was estimated that a wildfire involving only 10 percent of the grasslands presently grazed would kill about 3800 trees valued at \$30,000,000 (using DPR values). Director Agonia assured us that this did not apply since DPR did not intend to just let the fuel accumulate in the thousands of acres of grassland in Mt. Diablo State Park. It was pointed out and discussed at length that, although controlled burns are proposed in the chaparral, and discing, mowing, plowing or chemical spraying are planned along the firebreaks, the Resource and Land Use Elements and all the discussions at the five public meetings have indicated that in the thousands of acres of grasslands DPR intended to simply stop the grazing and let the grass accumulate. Director Agonia repeated his assurance that DPR would not let the fuel accumulate in the grasslands, and that he would see that the methods by which this would be done would be clarified in the Preliminary General Plan.

Well, this has not been clarified in the Preliminary General Plan. the contrary, the Plan still indicates that grazing will simply be terminated on all but the 600 to 1000 acres slated for the Mini-Rancho, and no alternative method is identified for preventing the build-up of excessive fuel in the 7,000 to 9,000 acres of grassland in the park. In a meeting September 7, 1989 with Contra Costa County Supervisor Robert Schroder, CDF and the local fire chiefs, homeowners, and other representatives of the surrounding communities, District Superintendent Felix Arteaga stated that DPR definitely does not intend to disc, plow, mow, or chemically spray the thousands of acres of grassland in the park. He said the grasslands would be "managed" like other resources, but could not or would not explain what this meant. This leaves only grazing, which the Plan rules out, or controlled burning which would be rediculous to consider on 9,000 acres every year on Mt. Diablo. Thus, in spite of the assurances given by Director Agonia, May 9, 1989, it is evident that DPR intends to just let the fuel accumulate in the grasslands.

The fact that this would spell the doom of most of the oaks and other thin-barked trees scattered throughout the grasslands is not even mentioned in the Environmental Impact Element, the Wildfire Management Plan, or anywhere else in the General Plan. This major impact has been called to the attention of the Director and the Planning Team repeatedly by many different individuals and organizations over the past three and one half years. This is not something that can be passed off as part of "the natural role of wildfires." On the contrary, DPR is proposing a very drastic change that will cause unprecedented, long-term impacts on the ecology of the mountain. Because these hills have always been grazed, the historical "natural" fires have been much less intense than those which result when grass is allowed to accumulate for years. Under a grazing regime, nearly all of the trees survive with only a minor scorching; in ungrazed areas, most of the thin-barked oaks and other trees are killed. This is not just speculation. Previous fires on Mt. Diablo have proven that this is what happens. And it's not up to the Fire Departments to worry about this kind of impact. Even though the eventual loss of most of the trees in the grasslands of Mt. Diablo State Park would also adversely impact the surrounding communities, this is a clearly a park resource issue for which DPR is responsible and must remain

accountable. How can it be that it is not even mentioned in the General Plan?

This major issue must be thoroughly addressed by DPR. The consequences of simply terminating grazing and doing nothing are clearly intolerable. DPR must identify the various alternatives and their respective impacts, devise a realistic, attainable plan that best meets the needs of the park and the surrounding communities, and ammend the General Plan accordingly.

As a constructive step toward this end, and in response to interest expressed by Director Agonia in a meeting March 15, 1989, I drafted a Management Plan which summarized the main issues relating to grazing and the Demonstration Ranch and suggested ways these issues could be resolved without drastic changes that would jeopardize park resources or the surrounding communities. This Management Plan was submitted along with the Cost Analysis to Director Agonia in May, 1989 (Attachment 2). I have had absolutely no feedback so far on this from DPR. I now request under CEQA that DPR objectively consider these approaches as alternatives to the course presently outlined in the Preliminary General Plan, and provide a rationale why this would or would not provide a better overall balance of the needs of park resources, park visitors and the surrounding communities.

Next, I would like to make a few specific comments on the Plan that are not addressed in the attached previous correspondence. On pages 81 through 82d, three Demonstration Ranch alternatives are discussed. I would like to make it clear that we were never consulted on these alternatives. We have, of course, described the background and the nature of the Demonstration Ranch Program as it as evolved over the last 17 years to most of the members of the planning team. occasion, Robert Hare asked me what would be the minimum number of acres that would allow us to maintain a self-supporting, economic I told him that this depended on cattle prices, other economic conditions, and several other factors, but that under normal conditions the break-even threshold was close to the area in our present concession agreement. No member of the team has ever talked to us about modifying the present interpretive program, cooperating in other special events, or any possible arrangements for continued operation on a less than self-supporting basis. It should also be noted that there are already broad provisions in our concession agreement for displays and interpretive activities by park personnel and volunteers that DPR has never taken advantage of.

Of the eleven individuals who prepared the Plan (Page 217) eight have visited the ranch, and we have discussed with them the background and nature of the Demonstration Ranch. However, besides Tom Bernardo (who like the other local park rangers has worked in conjunction with us on brandings and other special public events), only two others have ever attended any public event at the ranch (Stuart Hong and Robert Hare attended one event - Dan O'Hara's "Cowboy Day" May 2, 1988). None of the eleven have ever attended any of the hundreds of field trips we have hosted for local school children and other groups over the years.

The reason I mention this is to indicate that members of the planning

team have not only evidenced a conspicuous lack of interest in the ongoing Demonstration Ranch Program, but they also decided to scuttle the present operation and to subsidize a new, artificial mini-rancho without ever bothering to talk to us about possible modifications that might better meet overall objectives. Why is it that the present real Demonstration Ranch seems to be preferred by nearly everyone except the planning team?

Additional comments about the Demonstration Ranch and the representations made to us as part of the negotiations for the purchase of our rangeland in 1980 and the gift of the 281 acre Castle Rocks area are addressed in separate letter from my wife to Mr. Doyle, so I will not cover them here.

One specific point that I would like to call to your attention is that the 600 to 1000 acres that has been so often repeated as the area to be relegated to the Mini-Rancho, appears to be greatly overstated. The General Plan describes the area as that portion of the old Macedo Ranch that is west of Pine Ridge. According to my planimeter, this area appears to be only slightly over 400 acres.

There are many places in the Preliminary General Plan where the Planning Team's anti-grazing bias shows through. Rather than attempt to comment in detail on each of these, I would simply like to again emphasize that, on balance, the benefits of grazing far outweigh any disadvantages, and the Plan should be ammended accordingly.

In closing, I recognize that the Plan now has its own momentum, and that the planning team is in a firmly entrenched position to push its own agenda. However, I remain optimistic that reason will prevail. Perhaps the only way to correct the situation is for the Park Commission to overhaul DPR policies or for DPR leadership to clean house. There is too much at stake to allow bias to prevail over objectivity, or dogma to replace sound management.

Sincerely,

T. D. Brumleve

Attachments:

- 1. Letter, Brumleve to Rayburn, July 7, 1989.
- 2. Letter, Brumleve to Agonia, May 13, 1989.
- 3. Letter, Brumleve to Agonia, December 23, 1988.
- 4. Letter, Forty Organizations to Briner, February 21, 1989.



Contra Costa Resource Conservation District 5552 Clayton Road - Concord, California 94521 - Phone (415) 672-6522

September 6, 1989

Mr. James M. Doyle Environmental Review Section Department of Parks and Recreation P. O. Box 942896 Sacramento, California 94296-0001

Dear Mr. Doyle:

The Contra Costa Resource Conservation District is submitting as formal comments on The Preliminary General Plan for Mount Diablo State Park the following:

- Letter, Nuzum to Van de Kamp, 8/29/89

- Letter, Blake to CCRCD, 8/16/89

- Letter, Brumleve to King, 8/3/89

- Letter, Nuzum to Agonia, 4/23/89

- Letter, Felty to Nuzum, 3/3/89

- Letter, Nuzum to Felty, 6/25/88

- Letter, Kiger to CCRCD, 6/1/88 \ See Brumleve letter, Letter, Forty Organizations to \ " ")

William Briner, 2/21/87

- Letter, Nuzum to Briner, 2/27/87

- Letter, Nuzum to Hong, 11/23/85

Very truly yours,

Robert C. Nuzum, Fresident

Board of Directors

Contra Costa Resource Conservation District

Enclosures - 10

Contra Costa Resource Conservation District 5552 Clayton Road - Concord, California 94521 - Phone (415) 672-6522

August 29, 1989

The Honorable John K. Van de Kamp Attorney General of California 1515 K Street, Ste 511 Sacramento, California 75814

REF: The Preliminary General Plan/EIR for Mount Diable State Park - April, 1989

Dear Attorney General Van de Kamp:

When the State Park System was established in 1927 the original Mount Diablo State Park was already in existence, consisting of 630 acres near the summit of the mountain. The original park survey prepared by Frederick Law Olmsted in 1928 recommended 5,000-6,000 acres of fand be acquired to "round out" the small state park in existence at the summit. Contrary to this recommendation, acquisition has continued and the present area of the park includes 18,000 acres.

The Contra Costa Resource Conservation District, a Public Agency as defined in the Public Resources Code, has actively participated in the conservation of soil and water resources of Mt. Diablo State Park in accordance with our Cooperative Agreement, since June 13, 1967. Additionally, our District has participated in the public hearings regarding the General Plan/EIR. In addition, technical staff of our sister agency, the Soil Conservation Service, and several of our Directors have met repeatedly since 1985 with a variety of Department of Parks and Recreation (DPR) staff to resolve what our Board has determined are glaring deficiencies in the "plan process" and now in the "Plan/EIR," in particular.

It is the contention of this Board that substantive environmental concerns have been formally raised and submitted to DPR that have not been adequately addressed by DPR in the subject document, dated April, 1989 (attached). That significant direct and cumulative adverse environmental impacts which are reasonably foreseable from implementing DPR's "Plan/EIR" recommendations are not discussed and that said document does not discuss or propose mitigation for these potential impacts. In addition:

 The Plan/EIR" does not evaluate the cumulative impacts of construction of a great variety of proposed park facilities;

- o The "Plan/EIR" does not include an environmental analysis of the direct effects of DPR's proposals to modify Mount Diablo State Park; nor of the cumulative effects of such proposals;
- The "Plan/EIR" includes specifics on various changes that are planned which will create significant impacts to fish, wildlife, vegetation, invertebrates and their respective habitats—and it does not quantify nor adequately evaluate such impacts direct or cumulative; nor does the "Plan/EIR" propose adequate mitigation measures for such impacts;
- The "Plan/EIR states that several state and federallylisted threatened, rare, endangered or candidate plant and wildlife species are known to occur on the Mount Diablo State Park Lands. Neither direct nor cumulative impacts to such species have been quantified or evaluated in the "Plan/EIR"; and adequate mitigation measures have not been proposed;
- o The "Plan/EIR" does not quantify or adequately evaluate the direct or cumulative impacts to the unique native trout fisheries within Mitchel Canyon;
- The "Plan/EIR" lists classifications of Parklands in the Public Resources Code and DPR policies with regard to all the natural resource elements within Mount Diablo State Park but does not discuss whole or partial alternatives to their preferred programs. Alternatives to satisfy various elements of the Plan/EIR policies and recommendations are discussed only in isolation, and then inadequately. The "Plan/EIR" contains no meaningful discussion of alternatives to the "Flan/EIR" as a whole, or to any specific aspect in particular;

Attached hereto and incorporated herein are the comments provided to DPR during preparation and finalization of the "Plan/EIR." These along with numerous other comments submitted by the public and other entities, express the various deficiencies in the "Plan/EIR" including those outlined above.

The "Flan/EIR" has yet to be certified by the State Park and Recreation Commission which is contemplated at their hearing scheduled for November, 1989.

It is respectfully requested that your office review the facts and circumstances provided herein and direct DFR to prepare a new or subsequent EIR on the General Plan for Mount Diablo State Park

in compliance with CEQA and the CEQA Guidelines, to include therein all actions reasonably related to management of the lands which included, or which may be included in the foreseable future, in Mount Diablo State Park.

Very truly yours,

Robert C. Nuzum, President

Board of Directors

Contra Costa Resource Conservation District.

RCN:ng

Attachments:

- 1) Letter, Blake to CCRCD, 8/16/89
- 2) Letter, Brumleve to King, 8/3/89
- 3) Letter, Nuzum to Agonia, 4/23/89
- 4) Mt. Diablo State Park General Plan 4/89
- 5) Letter, Felty to Nuzum, 3/3/89
- 6) Letter, Nuzum to Felty, 6/25/88
- 7) Letter, Kiger to CCRCD, 6/1/88
- 8) Letter, Forty Organizations to William Briner, 2/21/87
- 9) Letter, Nuzum to Briner, 2/27/87
- 10) Letter, Nuzum to Hong, 11/23/85

David C. Nunenkamp, Chief Office of Permit Assistance Stuart Hong Mt. Diablo State Park Planning Team Director Pete Bontadelli Dept of Fish & Game Gordon K. Van Vleck Secretary for Resources Manuel Mollinedo, Chairman CA Park & Recreation Commission John Ross, Executive Vice President CA State Cattlemen's Association John Beard, Chairman Range Management Advisory Committee to Board of Forestry Ernie White, President

CA Association of RCDs

Subject: Mt. Diablo General Plan Date: August 16, 1989

To: Contra Costa Co. RCD Board of Directors

I have recently reviewed the Preliminary General Plan/EIR for Mt. Diablo State Park dated, April, 1989. The focus of my review was looking at the evidence and references sighted regarding grazing practices on Mt. Diablo. I have also addressed comments made in the plan referring to fire as a management tool for the park's plant ecosystem.

- (1) The document states that California Parks Department is interested in restoring fire to its "Natural role in the ecosystem" to achieve a restoration of native perennial grass vegetation, yet no linkage of fire is discussed with the role that grazing native herbivores played to maintain such an ecosystem. Urbanization around the Mt. Diablo area in the extinction of natural herbivores have removed the effects of unconstrained migrational grazing towards restoring the desired plant community. Because such a grazing regime cannot be restored manipulation of livestock grazing to simulate such effects should be addressed. Ongoing studies in California utilizing "Holistic Resource Management" grazing concepts are showing promise toward achieving increased populations of desired native perennial grasses. In as much as the D.G.P. lacks references to such studies, an incomplete argument is presented in the claim that only a "no-grazing" system can achieve their stated goals.
- (2) The document on numerous occasions refer to the California

 Parks people's contention that grazing must be removed from the Mt.

 Diablo area to restore the desired native perennial grass

 community. There are areas in the document that contradict their

own contentions. Specifically on page 51 the document states that they will plan road building, livestock grazing, and wild fire suppression in a manner to control erosion and sedimentation. This alludes to the fact that they acknowledge that livestock grazing can be conducted in Mt. Diablo State Park with minimal impacts. Many of the references sighted in this document refer only to studies that have been conducted on the erosional and sedimentation aspects of livestock grazing. They seem to present a rather one sided argument in this regard.

- (3) The document also refers to the use of prescribed burning in and of itself to achieve the desired perennial grass community. My question here is will prescribed burning alone do this? Numerous studies completed in the Mediterranean climatic regimes common to California show that plant communities resulting from prescribed burning treatments alone result in lower successional plant communities. My experience is that these communities eventually revert back to the annual grass plant community found in most areas of California. This concept of prescribed burning without grazing presents a very incomplete argument for restoration of native grassland communities.
- (4) Page 57 the document refers to the use of "fuel breaks, mechanical methods, and prescribed fire" to reduce fuel loads, yet does not discuss the potential of grazing to help manage this. On page 56 it is stated that, "due to the excessive level of grazing required to achieve uniform fuel reduction which needs to occur early in the season, grazing can't be relied on to reduce fire potential". My experience been that a properly grazed grassland carries a cooler burn that is more easily controlled.

- (5) On page 57 of the document the statement is made that "grazing may be considered as part of a comprehensive program to restore native perennials". It goes on page 61 to say that, on the smaller demonstrational ranch area grazing by a livestock management plan will provide for protection of resources and management toward a natural condition with minimal impacts. My question here is if grazing can be acknowledged as a useful tool for the smaller demonstrational ranch why can't a similar plan to be implemented on currently grazed areas?
- (6) On page 56 the document discusses the elimination of cross fencing and water development as part of a plan to restore the area to its pristine conditions. There is no discussion of the beneficial uses of the water developments towards providing beneficial wildlife watering facilities. Livestock water facilities provide excellent opportunities for wildlife habitat enhancement.
- (7) Page 52 of the document stated that concentrated visitor use and livestock grazing has led to impacts on the riparian community. The document seems to allude to the fact that total exclusion of man and livestock from riparian communities will be the answer to restoring desirable natural riparian plant cover. Range studies performed by the BLM in eastern Oregon show some very beneficial uses of livestock in riparian areas when season of use and animal numbers are controlled.
- (8) I think the state really needs to consider the Coordinated Resource Management Plan, (C.R.M.P.) approach to study the various treatments and monitoring that could be tried in Mt. Diablo.

Agencies with expertise in range land management, fire suppression, and management of wildlife should be invited to work with the Parks Dept. to develop a plan for enhancement of natural plant communities.

Sincerely,

Phillip Blake

District Conservationist



Contra Costa Resource Conservation District 5552 Clayton Road - Concord, California 94521 - Phone (415) 672-6522

August 3, 1989

Robert F. King
Office of Permit Assistance
Governor's Office of Planning and Research
1400 10th Street
Sacramento, CA 95814

Dear Mr. King,

Following up on our phone conversation today, the Board of Directors of the Contra Costa Resource Conservation District (CCRCD) requests your assistance in resolving some problems relating to the development of the General Plan for Mt. Diablo State Park by the Department of Parks and Recreation (DPR).

Starting in late 1985, the CCRCD has repeatedly raised serious concerns about the impacts that DPR's proposal to stop virtually all of the grazing in Mt. Diablo State Park would have on the natural resources of the Mt. Diablo watershed and the surrounding communities. These concerns arise principally from the unnaturally high levels of fuel that would accumulate in the over 9000 acres of grasslands on the lower slopes of the mountain. Subsequent wildfires would be much more intense, would be much more difficult to control, would kill most of the oaks and other trees (rather than only scorch them), and would cause other unusual damage to the watershed that would lead to excessive erosion in the Park and to severe sedimentation and flooding downstream in the surrounding communities.

Judging by input at the five public meetings, personal discussions, and voluminous correspondence, these concerns are shared by resource and firefighting professionals, the Contra Costa Board of Supervisors, many local and statewide organizations, and by the vast majority of park visitors and residents of the local communities. Yet, DPR has been arrogantly unresponsive to these concerns, has misrepresented many of the issues, and has pushed on with what has obviously been its own agenda from the outset -- namely, to stop the grazing regardless of impacts on the resources or the surrounding communities (under the guise that cattle are "unnatural"). Rather than elaborate upon these concerns here, I am enclosing copies of some relative correspondence as background information.

Our principal reason for appealing to your office is not to ask you to try to settle the issues themselves, but rather to see if you may be able to help correct what we consider to be an arrogant abuse of power by some firmly entrenched DPR employees that is making a sham of the General Plan and CEQA process.

To cite only one example, the CCRCD and many others have stressed the importance of grazing animals (previously elk and antelope, and more recently cattle) for keeping the fuel load low enough so that oaks and other trees scattered throughout the grasslands of Mt. Diablo can survive wildfires. The trees have adapted over tens of thousands of years to the less intense fires that occur under a grazing regime, but most would be doomed if grazing were discontinued and fuel were allowed to accumulate in this very productive area. This would ultimately cause major deleterious changes in the ecology of the mountain, and would have serious and costly impacts on the surrounding communities. We have tried for over three years to get DPR to address this very important issue, but to date there has been absolutely no substantive response. The Preliminary General Plan is now out for the 45 day CEQA review, and this issue is not even mentioned in the Environmental Impact Element (or anywhere else in the Plan).

The planning team has said that the DPR General Plan is the functional equivalent of an Environmental Impact Report. Is this true? It is our understanding that CEQA requires that every substantitive environmental concern that is raised must be addressed along with a thorough evaluation and comparison of the impacts of any alternatives or mitigations. This has clearly not been done in the Preliminary General Plan for the forgoing example (impact on trees) or for the other impacts that would result if grazing were discontinued.

please be assured that we stand firmly in favor of using the best management tools to accomplish whatever the resource objectives are. Grazing may or may not be appropriate as one of those management tools, depending on the objectives. But there is no place for the kind of personal or bureaucratic biases that have thus far permeated and distorted the development of the General Plan for Mt. Diablo State Park. Nor should DPR or staff members within DPR be allowed to use their positions to push their own philosophies or to circumvent the letter or the intent of CEQA. We remain confident that if the issues are evaluated objectively, the outcome will be good both for the natural resources of the park and for the people of California.

We would appreciate the opportunity to meet with you to discuss these concerns about the process in more detail. Please give me a call to arrange a mutually acceptable time.

Sincerely,

T. D. Brumleve

Executive Secretary

Encl:

- 1. Letter, Nuzum to Felty, 6-25-88
- 2. Letter, Morgan to Agonia, 1-24-89
- 3. Letter, Felty to Nuzum, 3-3-89
- 4. Letter, Nuzum to Agonia, 4-23-89
- 5. Letter, Agonia to Nuzum, 5-24-89

cc: CCRCD. Directors

We are aware, as the planning team is undoubtedly also aware, that certain activists have been spreading misinformation claiming terrible damage is being caused by grazing on Mt. Diablo and have solicited many letters in opposition to grazing from individuals who have no personal knowledge of Mt. Diablo. Every individual has a right to express their own opinion, whether informed or misinformed, but we believe it is unconscionable for public servants to selectively cite information in a way that supports their own agenda and conveys an impression that is contrary to the truth.

I realize I am being very blunt, and that our critical comments are not likely to be heartily welcomed. As an independent unit of local government, however, our responsibility on behalf of the citizens of Contra Costa County is to promote conservation and wise stewardship of natural resources throughout the district (which includes Mt. Diablo State Park). We have tried to work with the planning team, but have found them to be uncooperative and unwilling to consider anything that seemed contrary to their preconceived notions.

For this reason, I respectfully request that you personally review the two enclosed letters and give us the courtesy of a substantive reply. I realize that you are very busy, but please do not shuffle this off to your planning staff; we have lost all confidence in their professional objectivity and have no interest in further self-serving platitudes. We also want you to know that we will carefully scrutinize the General Plan when it becomes available for review, and that we intend to make sure that all of the resource and environmental issues are fully addressed as required by the California Environmental Quality Act.

Thank you for your attention to these matters, and we will be looking forward to your reply.

Sincerely,

Robert C. Nuzum

President

Enclosures:

1. Letter, Felty to Nuzum, 3-3-89

Letter, Nuzum to Felty, 6-25-88

Copy to:
Richard Felty
Gordon Van Vleck
State Park Commission
Bill Baker
Dan Boatwright
Contra Costa Board of Supervisors

DEPARTMENT OF PARKS AND RECREATION

Central Coast Region 2211 Garden Road Monterey, CA 93940 (408) 649-2840



March 3, 1989

Mr. Robert C. Nuzum, President Contra Costa Resource Conservation District 5552 Clayton Road Concord, CA 94521

Dear Mr. Nuzum:

We have reviewed your June 25, 1988 letter concerning livestock grazing and the Mount Diablo Wildfire Management Plan. We are also in receipt of the January 24, 1989 letter to Director Agonia from W.G. Morgan requesting a substantive response to the June 25 letter.

Thank you for your comments on the Wildfire Management Plan. Department staff have spent hundreds of hours developing the plan which addresses the State's responsibility for wildfire prevention and suppression at Mount Diablo. The plan was prepared in close coordination with the responsible fire suppression agencies in the area. In 1988, the Contra Costa County Board of Supervisors endorsed this plan and the Department received concurrence from the local fire chiefs. It is generally agreed by the responsible fire suppression professionals that when implemented, the plan will provide improved fire protection over that which presently exists. With this support, the Department is now of the opinion that the wildfire issue has been resolved and the General Plan can move ahead. We expect that a General Plan will be approved by the State Park and Recreation Commission in August 1989 that includes the proposal for a substantial reduction of grazing in the park.

Your specific comments on the Wildfire Management Plan and the grading practices you have observed are noted. As the plan is implemented, we expect to correct any deficiencies and restore areas that are damaged. We plan to hold annual meetings with local fire agency personnel to evaluate the plan and make appropriate revisions when necessary.

Mr. Robert C. Nuzum Page 2 March 3, 1989

The Department of Parks and Recreation understands your District's position that conservation of the resources of Mount Diablo would be best served by the continuation of grazing in the park. We do not doubt your sincerity or your motives. Our management objectives are different than those of your District, and as the responsible management agency, we intend to meet our objectives. Livestock grazing in the State Park System is generally contrary to the Department's resource preservation and recreation missions. Our Department's position on grazing is not new. We have an established policy of phasing out grazing when new lands are acquired. This policy has been successfully applied to nearly all of the over one million acres of land for which we are responsible.

There is broad based support to significantly reduce livestock grazing in Mount Diablo State Park. To date, we have received over 400 letters on this issue with about 300 letters recommending reduction or removal of livestock grazing. Six Bay Area legislators have endorsed the recommendations to reduce grazing to a 600-1000 acre interpretive ranch.

The preliminary General Plan will be available for public review as a CEQA document in May 1989. If you would like to make written comments on the plan, you should do so during the CEQA review period. There will also be the opportunity to present oral testimony at the State Park and Recreation hearing in August.

Sincerely,

Richard E. Felty

Regional Director

cc: Director's Office

Stewart Hong, Development Division

Gary Fregien, Resource Protection Division

Felix Arteaga, Diablo District



Contra Costa Resource Conservation District 5552 Clayton Road - Concord, California 94521 - Phone (415) 672-6522

June 25, 1988

Richard Felty
Director, Central Coast Region
California Dept. of Parks & Recreation
2211 Garden Rd.
Monterey, CA 93940

Dear Mr. Felty,

The Board of Directors of the Contra Costa Resource Conservation District (CCRCD) recently had the opportunity to review a draft of the Wildfire Management Plan for Mt. Diablo State Park, along with your letter of March 15, 1988 to the local fire chiefs, and we would like to offer the following comments for your consideration.

Our overall impression is that it is a good Plan, and that it should result in a number of improvements if fully implemented. The CCRCD has long been a strong advocate of the better planning, communications, firebreaks, definition of responsibilities, etc. that are the main thrust of the plan. We are pleased to see the Park cooperating with our local fire districts. However, we do have some concerns.

Our principal concern is that the Park Department seems to be offering the Fire Plan as a substitute for grazing. Virtually all of the actions identified in the plan need to be accomplished whether or not grazing is allowed to continue. But the plan is not a substitute for grazing, and it should not be represented as such. Grazing is complementary to the Fire Plan, and both are needed.

The primary interest of CCRCD in this matter is in the resources of Mt. Diablo which is the dominant watershed of Contra Costa County. We remain convinced that the conservation of these resources is much better served by the continuation of well managed livestock grazing in the park than would be the case if grazing were eliminated or drastically curtailed.

The board's reasons for this position were first outlined in a letter to the park staff responsible for the general plan November 23, 1985, and have been further discussed in depth in subsequent correspondence and special meetings with the planning team. We note that you were not included in the initial distribution of some of this correspondence, so we are enclosing copies for your information. In February of last year, the CCRCD also joined with the California Association of Resource Conservation Districts and 38 other state and local organizations in a strong expression of concern and opposition

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to the Park's proposal to ban grazing. We believe (1) that this letter still represents the views of the majority of park visitors and the residents of surrounding communities, and (2) that the Department has still not adequately responded to the important concerns and recommendations expressed therein. A copy of this joint letter is also enclosed, and we commend it to your review and serious consideration.

As a public body dedicated to wise management and conservation of resources, and the use of the best management practices available toward this end, the CCRCD board is appalled at the mind-set against grazing which has impeded and distorted the development of a general plan for Mt. Diablo State Park. It has become more and more evident that the planning team had already decided at the outset that grazing would be banned, that they turned the public hearing and input process into a sham, and that they have blatantly ignored or discounted virtually all input from the scientific, resource management, firefighting, and the local communities regarding the positive aspects of grazing for fuel and resource management. Dogma is a poor substitute for good management.

It also appears that the planners have attempted to rationalize their position by claiming that grazing violates the public resources code and park policy. It is unfortunate that this same misguided zeal now seems to be spilling over into the fire plan and threatens to jeopardize not only surrounding communities but the park resources as well. On page two of your letter of March 15, 1988, for example, you summarize several of the assertions or positions upon which the planners have based their proposal to ban grazing. We must take issue with some of these since they ultimately bear on the fire hazard issue:

1. "Although the local fire fighting agencies have looked at this grazing activity at Mount Diablo State Park as a major fuel control function, the Department of Parks & Recreation considered it as only a revenue generation and interpretive activity and not a tool for resource management or fuel management."

That DP&R has taken this "position" does not change the fact that grazing is an important, proven tool that has been widely used for both resource and fuel management throughout the world; nor does it change the fact that grazing has been beneficially used for both of these purposes on Mt. Diablo for many years. The planning team's claim that "effective fire hazard reduction is only achieved by overgrazing" is rediculous! All of the fire fighting agencies having jurisdiction on Mt. Diablo, along with all of the experienced fire fighters we have checked with, say this is simply not true. A fire is much easier to control in grazed areas than in ungrazed areas. Less fuel means less intensity and reduced hazards to lives, homes and resources.

When we questioned the planning team about this, the only basis cited was a U.S. Forest Service computer fuel model that showed the rate of spread to be about the same in grazed as in ungrazed grassland. While rate of spread is certainly a factor in response time considerations,

the intensity of the fire is normally much more important when it comes to actually fighting a wildfire and protecting homes and other property. Also, it is primarily the intensity, rather than rate of spread, which determines the severity of damage to trees and other natural resources involved in a fire. This same fuel model indicates the fireline intensity in ungrazed grassland is 7 to 8 times higher than in grazed areas. Although we understand this model has not been validated for grasslands, this seems consistent with Soil Conservation Service field measurements of 4 to 15 times more grass and weeds (2 to 8 tons per acre) around the perimeter of the park in grasslands ungrazed for three or more years. The height of this standing fuel is also much higher than in grazed areas with the average being generally in the range of 2 to 5 feet with large stands of mustard in some areas reaching heights of 7 to 9 feet.

The planners seem to have forgotten that grazing animals have been an integral part of the grassland ecology for tens of thousands of years. The large herds of elk and antelope, along with the cattle which gradually replaced them over the past two hundred years, contributed to the survival of oaks and their adaptation to fire by preventing excessive, multi-year accumulations of fuel. When a wildfire occurred, most of the oaks survived with only a scorching. are not adapted to the much more intense fires which result in ungrazed grasslands in this very productive area of central California. This was tragically evident (and is still evident) from the 6,000 acre fire on Mt. Diablo in 1977 where hundreds of oak trees were killed in some ungrazed grasslands while those in the grazed areas generally survived. If grazing were now to be stopped, and excessive fuel allowed to accumulate, the next wildfire would undoubtedly consume or kill a large percentage of the present inventory of oaks scattered through the grasslands of the park. We find it difficult to understand how DP&R planners can propose to stop grazing when it would so clearly jeopardize the trees and other natural resources they are charged with protecting.

2. "During this planning process, it was determined that grazing was having a serious impact on the park's natural resources."

We have been unable to find any rational basis for this statement inside or outside of DP&R. In fact, the most qualified, experienced range and resource professionals we know of have gone on record that just the opposite is true. It is even contradictory to statements made by the planning team and other DP&R staff to this board. They assured us the concessionare's cattle operation and range management has been exemplary. When invited to show us examples in the field of significant damage to the natural resources, they declined, and explained that any such damage was really very minor. They then went on to explain that the real issue was that cattle were "unnatural" and had no place in the pre-euroamerican wilderness scenario they wanted to recreate.

3. It was also "determined" that grazing "was, in fact, a violation of the Public Resource Code and Department policy which only allows grazing on park lands as a short term resource management tool or for limited interpretive program purposes."

We have reviewed the Public Resources Code, and the Park Commission policies, and have found nothing that prohibits grazing in state parks or imposes the above limitations if the Director and the Park Commission finds it to be in the park's best interest. We have of course become very aware of the strong biases against grazing within certain segments of DP&R and the Departments history of foreclosing grazing at nearly every opportunity. But to claim that grazing in Mt. Diablo State Park under concession contracts approved by a succession of Park Directors dating back to 1970 somehow violates the Public Resources Code strikes us as nothing more than a rather devious attempt to conceal ill-founded biases under a cloak of law.

Going on now to a couple of concerns with the Fire Plan itself, we note that a large fraction of the so-called "perimeter fuel break" is displaced quite a long ways up inside the park from the actual park perimeter. On the west, southwest, south and southeast sides of the park, for example, the perimeter fuel break generally follows existing fire roads which are up to a mile or more inside the park boundary. This leaves large expanses of park grasslands and chapparal outside of the perimeter fuel break and nothing to stop a wildfire from sweeping down into the surrounding residential developments. These adjacent developments include the Bogue Ranch and upper Livorna Rd. area, Round Hill, Bryan Ranch, Whitegate, Diablo Lakes, Athenian School, and all of the Blackhawk Development.

Considering the rugged terrain, we realize it is impractical, undesirable, and in some areas virtually impossible, to follow the park boundary exactly. However, it should be recognized that grazing has long been a major factor in reducing the fire hazard in these and other areas around the perimeter of the park. In addition to the grazing, some of the property owners presently disc firebreaks at their own expense where it is practical to provide themselves further protection from wildfires sweeping down from the hills. If the park terminates grazing and allows excessive fuel to accumulate, the fire hazard to these surrounding communities will be greatly increased. This would probably also raise a serious question of liability. In any event, the surrounding communities should be made aware that the perimeter fuel break is not on the park perimeter, and of the increased hazard that will be imposed if the DP&R terminates grazing.

On the subject of the practices employed by the DP&R in grading fire roads and discing firebreaks during this spring, we are quite disappointed. As you may know, the CCRCD has for some years been encouraging private landowners and public agencies in Contra Costa County to use improved techniques in maintaining fire roads and firebreaks so as to reduce gullying, erosion and downstream sedimentation. Steady progress has been made during the past several years and during the time that the fire districts have been doing the fire roads on Mt. Diablo. Unfortunately, we have seen a considerable amount of this progress undone by the park graders this past spring. Roads are being tilted inward, berms are being left on the outer edge, rolling dips have been removed, and natural watercourses have been diverted down the road. Such practices produce water concentrations which cause gullies, excessive erosion and downstream sedimentation.

Also, we were dismayed to find new firebreaks which in the fire plan were to have been 10 feet wide with mowed strips on either side were instead disced to widths up to 65 feet. Some of these parallel existing fire roads, and some were routed straight down steep slopes. Further details of these observations are given in the enclosed summary letter from Luana Kiger, SCS District Conservationist, dated June 1, 1988. We would hope that steps could be taken to correct these problems before the rainy season.

On another technical matter, there is an inconsistency in Table 1 on page 4 of the plan. Available fuel loading for grassland is shown as 1 ton per acre. Many field measurements by the SCS over the years on Mt. Diablo rangelands indicate this value is a reasonable estimate for grazed areas (measured values are usually in the range of 0.5 to 1). But available fuel in lower grasslands which have been ungrazed for three or more years is much higher and is generally in the range of 2 to 8 tons per acre. This applies to areas of scattered oaks as well as open grasslands. Thus, the upper end of the range of available fuel loading approaches or overlaps the lower end of that for brushlands. We are not sure how the NFDRS model is being used for the fire plan, but in view of the importance to resource protection and fire fighting, we suggest that values for ungrazed grasslands be added to the list in the fire plan. We also suggest that it would be more informative to show the typical range rather than just an average value for each of the fuel types. Similar distinctions should also be made in Section VII E.

We believe the foregoing concerns and comments deserve serious consideration by the planning team. Frankly, however, it appears to us that the planning team has for over two years continued to ignore any community input that does not happen to agree with their own views. Therefore, we believe that DP&R management should listen to the community, pay attention to the experts, place common sense above ill-advised dogma, and do what is best for Mt. Diablo State Park and the neighboring areas.

We stand ready and willing to help in any way we can.

Sincerely,

Robert C. Nuzum

President

Enclosures:

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- 1. Letter, CCRCD to Stuart Hong, 11/23/85
- 2. Letter, Forty Organizations to William Briner, 2/21/87
- 3. Letter, Robert Nuzum to William Briner, 2/27/87
- 4. Letter, Luana Kiger to Robert Nuzum, 6/1/88

Copy to:

Bill Beat

Henry Agonia



February 27, 1987

William Briner, Director California Department of Parks and Recreation P.O. Box 942896 Sacramento, California 94296-0001

Dear Mr. Briner:

This is in regard to the Preliminary Resource Element prepared by your Department for establishing the long-range management objectives for Mt. Diablo State Park. I have been involved personally with the development phase of this plan and have provided written comments and attended all of the public meetings where it has been discussed. In addition, I have attended special meetings where your staff explained their position on pertinent issues in regards to State Park Policy(s) and the appropriateness of a number of potential park uses, user groups, and Best Management Practices.

In short, the Resource Element is short sighted, severely biased, undocumented, and cannot be scientifically substantiated. It does not satisfy the letter or intent of the Public Resources Code requirements for its preparation. Considering the personal biases I have heard from your staff, I remain unconvinced that they are capable of satisfying your Departmental objectives. I realize these are strong comments and I want you to appreciate that I do not make them lightly.

To lend some measure of credibility to my comments:

Like you I am a park professional having managed natural resources for the East Bay Municipal Utility District (including 56,000 acres of land, 13,500 surface acres of water in 7 reservoirs and 6 regional recreation areas with over 3.0 million visitor days annually) for the last 15_years, and 7 additional years with several other agencies. In addition, I am President of the Board of the Contra Costa Resource Conservation District, which includes Mt. Diablo Park, and President of the California Association of Resource Conservation Districts serving 120 districts statewide.

I believe strongly in utilizing Best Management Practices (BMPs) without regard for personal, special or political interests. Too often I see glaring examples, such as this particular Resource Element, where BMPs are poorly described or utilized, or as in this case, completely disregarded. BMPs that have stood the test of time and considerable scientific scrutiny cannot be placed as a secondary consideration to any use, and yet that is what one finds within the Resource Element under consideration. To allow this practice is to forsake the natural resources we are sworn to conserve, maintain and, where we can, to enhance. In addition, a resource analysis carefully itemizes what is there, why, its current and historic condition, and its benefit/detriment to the environment, without predisposing what is to come in other elements or according to some preconceived notion of what is and is not appropriate. It is imperative that a Resource Element be absolutely impartial which provides the scientific credibility or foundation for developing intelligent management options and making wise decisions now and hopefully for the benefit of generations to come.

Policy(s) formulated, as your staff has indicated, that may place particular uses or user groups as a priority over your Department's primary objective of managing the natural resources under your control are inappropriate. If such is in fact the case as they claim, then this policy(s) must be amended.

Many of us in the scientific community watched with dismay and alarm the creation of the resources plan for Henry Coe State Park without proper regard for the necessary BMPs to manage its considerable natural resources. Your staff explained how special interest groups, in particular, took over and modified or eliminated the use of some BMPs. In my mind your Department was ultimately responsibile for development of an adequate plan and it failed. Knowledgeable facilitators are available who could have provided the leadership necessary to develop and implement a scientifically sound and reasonable plan, one that would have provided for all BMPs primarily and secondarily one that would have provided for all reasonable uses and user groups in keeping with your Department goals and objectives. Many of our concerns regarding Henry Coe State Park have become a reality which is not acceptable.

I do not intend to stand idle and watch the same dog and pony show take place at Mt. Diablo State Park or at any other park in the State Park System. Our concerns at Mt. Diablo State Park have been brought to the attention of your staff as requested and we expect to see adequate consideration of the issues raised and the concerns outlined.

I would appreciate your personal thoughts and comments regarding state park policy(s), resource priorities, the development and use of BMPs, what constitutes a natural resource analysis and what your specific action will be in regards to the Resource Element for Mt. Diablo State Park. At your earliest convenience, please.

Very truly yours.

Robert C. Nuzum

President

cc: Bill Beat, Park Manager--Mt. Diablo State Park George Deukmejian, Governor Gordon Van Vleck, Secretary for Resources Gene Andreuccetti, State Conservationist--USDA Soil Conservation Service Bill Baker, Assemblyman--10th District Dan Boatwright, Senator--7th District Jim Nielsen, Senator--4th District Raymond Nesbit, Chairman--Parks and Recreation Commission Sunne McPeak, Chairwoman--Contra Costa County Board of Supervisors Area Directors--California Association of Resource Conservation Districts Bill Bruner, District Conservationist--USDA Soil Conservation Service, Concord Denis Nickel, Area Conservationist--USDA Soil Conservation Service, Santa Rosa Ed Campodonico, Chairman--Range Management Advisory

Committee to State Board of Forestry



Contra Costa Resource Conservation District 5552 Clayton Road - Concord, California 94521 - Phone (415) 672-6522

November 23, 1985

Stuart Hong
Mt. Diablo State Park Planning Team
Department of Parks and Recreation
P.O. Box 2390
Sacramento, CA 95811

Dear Mr. Hong,

The Contra Costa Resource Conservation District (CCRCD) is dedicated to the conservation and wise use of all natural resources within Contra Costa County with particular emphasis on soil, water and wildlife. Toward this end, we provide information and assistance to the general public and to our more than 500 cooperating farmers, ranchers, companies, and public agencies on more than 2500 land units throughout the county. Policies and programs are administered by an elected board of directors, and technical assistance is provided by the Soil Conservation Service of the U.S. Department of Agriculture. As you are probably aware, the CCRCD has a long standing cooperative agreement with Mt. Diablo State Park.

In response to your solicitation of ideas and comments from local individuals and groups at your meeting on the General Plan, October 2, 1985, the board of directors discussed a number of issues within our sphere of interest, and had five recommendations to offer for your consideration. These recommendations are based on the following facts:

- A. Cattle grazing is an important, proven tool for good range management.
- B. Proper grazing is beneficial in promoting a greater diversity of desirable grasses, wildflowers and other plant species.
- C. Grazing does not cause significant erosion when good range management is used and where adequate residues remain at the beginning of the rainy season.
- D. Diablo Ranch is a long term cooperator with the CCRCD, has voluntarily applied many conservation practices, uses good range management, avoids overgrazing, and leaves residues known to be adequate by objective measurements.
- E. If the annual rangelands of this area are not grazed, they do not naturally return to the perennial ranges that predated the first Spanish settlers, but instead degrade to a thatch of old grass which smothers all but the hardiest weeds and annual grasses.

- F. Grazing is often the only economically practical method of preventing excessive fuel accumulation and for reducing the seasonal fire hazard in the annual grasslands of this area.
- G. A fire is much easier to control on grazed grasslands than it is on ungrazed areas; consequently, the extent and severity of the burn is usually lessened. Subsequent erosion tends to be less severe and recovery is quicker because more seed and subsurface root structure survives.
- H. Increased erosion and more rapid water runoff from Mt. Diablo after a major fire can create flooding and sedimentation problems and consequent economic impacts for the communities around the base of the mountain.
- I. Past experiences indicate the potential for improved planning and more effective coordination between Mt. Diablo State Park, the California Division of Forestry, and the local fire districts in the suppression of major fires on and around Mt. Diablo.
- J. The deer population in Mt. Diablo State Park and the surrounding areas, particularly the numbers of surviving fawns, appears to be declining since the introduction of coyotes to the Park some years ago.
- K. Increased coyote predation of newborn calves and of sick or injured cattle, along with increasingly bold behavior by coyotes has been reported by a number of our cooperators on and around Mt. Diablo.
- L. Grazing by ruminants is the only practical way to convert our large grassland resources to a food form edible by humans.
- M. Cattle ranching has long been and still is an important part of the cultural heritage of this area. The Demonstration Ranch Program operated by Mt. Diablo State Park in cooperation with Diablo Ranch not only preserves this heritage, but also helps educate our mostly urban population about the vital role of cattle in the harvesting of grassland resources for the production of human food.

Based on the foregoing, the Board unanimously makes the following recommendations:

- 1. The Contra Costa Resource Conservation District Board of Directors strongly recommends that grazing be continued on the grasslands of Mt. Diablo State Park.
- 2. A comprehensive range resource assessment should be done as an integral and necessary part of the resource element of the General Plan.
- 3. The Demonstration Ranch Program within Mt. Diablo State Park should be emphasized, and expanded if possible.
- 4. Mt. Diablo State Park should take steps to control its coyote

population.

5. A more effective fire suppression plan should be worked out between Mt. Diablo State Park, California Division of Forestry, and the local fire districts to provide better protection for park lands and surrounding properties.

We appreciate the opportunity to provide input to the formulation of the General Plan for Mt. Diablo State Park. The park is not only the dominate landform and a major recreational resource in the area, but it also constitutes one of the largest and most important watersheds in Contra Costa County. Even though the sense of isolation, and escape from the urban crush is one of the charms of Mt. Diablo, it is not a wilderness and it is not an island unto itself. Because of this, we believe the General Plan should pay particular attention to the potential impacts of any changes within the park upon the surrounding communities. These impacts may be positive or negative, but they need to be identified and taken into account in the General Plan.

If we can help in any way, including any special technical assistance from the Soil Conservation Service, please let us know. I am enclosing a copy of our 1984 annual report to give you an idea of our current activities and capabilities.

Thank you for taking our views into consideration, and we will appreciate the opportunity for further involvement as the General Plan progresses.

Sincerely,

Robert C. Nuzum

President



3670 Enterprise Avenue, Hayward, CA 94545 Telephone (415) 785-0425 • Fax (415) 785-6463

September 7, 1989

Mr. James Doyle, Supervisor Environmental Review Section State of California Dept. of Parks & Recreation P.O. Box 942896 Sacramento, CA 94296-0001

To Whom It May Concern:

RE: Livestock Grazing - Mt. Diablo State Park

Clyde Robin Seed Co., Inc. would like to express a serious concern over the possible limitation of livestock grazing at Mt. Biablo State Park. Clyde Robin Seed Company specializes in the collection and production of wildflower seeds. We are recognized world-wide for our expertise in the production of California native forbs, shrubs and trees.

The grazing by livestock, particularly cattle, plays an important role in modifying the ecological succession of plants in an area. Grass competition severely restricts growth of Flowering forbs such as California poppy and annual lupines. Livestock grazing reduces the grassy competition helping insure wildflower displays. Grazing has also played an important part in restricting the encroachment of shrubs into existing "grasslands".

The idea that by restricting grazing, the area will return to a "native" state is hypothetical. The naturalized annual grasses are well adapted to our climate and do not giveway to native perennials. Vegetative manipulation thru correct grazing management can realize changes in the plant composition of a sward.

Clyde Robin Seed Company would like to encourage the continuation of grazing at Mt. Biablo State Park to enhance the scenic beauty of the area with healthy wildflower displays, limit shrub encroachment, reduce vegetation and the risk of uncontrolled wildfires.

Please let me know if you have questions regarding these

comments.

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PM: 1ms

cc: Governor George Deukmejian Sacramento, CA 95814

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September 11, 1989

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation Sacramento, CA 94296-0001

RE: The Preliminary General Plan for Mount Diablo State Park

Dear Mr. Doyle:

We are extremely concerned that eliminating cattle grazing from Mount Diablo will greatly increase the fire hazard to adjacent homes. Grazing is important for reducing the amount of fuel in these highly productive grasslands, thereby reducing the intensity of wildfires and making them much easier to control. Resource experts confirm that grazing management within the park is good. By rotating the herds among 17 fenced areas, cattle occupy only 6% of the park at any one time and reduce the fuel to the proper level before being moved. This kind of land management protects the oak trees and other natural resources. We believe that neither the Wildfire Protection Plan nor the Preliminary General Plan offer adequate means to reduce fuel build-up. Therefore, we recommend that the General Plan be amended to include cattle grazing as an integral part of wildfire protection for Mount Diablo.

We also urge you to consider the historical significance of Diable Ranch and its Demonstration Ranch Program. This is an important educational resource for the local communities. As traditional ranching is displaced from the Bay Area, it is important to preserve a real working cattle ranch. The ranch dates back to the first settlers. It is self-supporting, and provides

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Mr. James M. Doyle September 11, 1989 Page Two

extraordinary benefits to the park and the surrounding communities. We would like to see provisions included in the General Plan for the continuation of the Diablo Ranch Demonstration Program as currently structured.

We appreciate the opportunity to respond to the General Plan.

Sincerely,

BOB L. VICE President

BLV:sal

cc: California Parks and Recreation Commission

September 8, 1989

Mr. James M. Doyle, Supervisor Environmental Review Section California Department of Parks and Recreation Post Office Box 942896 Sacramento, California 94296-0001

Dear Mr. Doyle:

This is in response to the California Department of Parks and Recreation Preliminary General Plan for Mount Diablo State Park. The Plan's thrust is to provide opportunities for interpretation, enjoyment and appreciation of the park's prime resources. We have reviewed the Public Resources Code and have found nothing that prohibits the livestock grazing in California's state parks or imposes grazing limitations if the Director and Parks and Recreation Commission find grazing to be beneficial. We believe the general plan can be accomplished without changing the present grazing program under a new agreement between the DPR and the Diablo Ranch.

One of the major project recommendations is to establish a 600-1,000 acre interpretive ranch on park property. This includes contracting with a rancher to graze a 100 head interpretive cattle herd on that ranch and developing interpretive facilities and volunteer support for the interpretive ranch. We appreciate the interest in interpretive programs, but we are concerned about not continuing the interpretive program with the existing Diablo Banch.

Considering the size of the park and the potential for wildfires, we believe that the Mt. Diablo State Park should continue to allow the Diablo Ranch as both an interpretative and viable ranching operation. Our interest for the continuation of a more extensive livestock grazing program relates to the vast 18,000 acre park and its potential for wildland fires...the concern about the potential of fires and their control has been central to the whole issue of livestock grazing. As stated in the report, "...wildfires can be a threat to natural resources, facilities, and human life and property."

Proper grazing has proven to be a valuable management tool on both private and public lands. Grazing is often the most practical and environmentally acceptable way to prevent the accumulation of excessive fuel that causes serious wildfires.

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Mr. James M. Doyle September 8, 1989 Page Two

It seems that a fire protection plan for vegetation management should include grazing, fire road maintenance, and prescribed burns. Grazing is often the only economically practical method to prevent excessive fuel accumulation to reduce the seasonal fire hazard.

The Contra Costa County Consolidated Fire District stated in a letter dated January 26, 1987, that the fire threat must be mitigated and that "...a fire is much easier to control on grazed grasslands than it is on ungrazed areas; consequently, the extent and severity of the burn is usually lessened." According to James W. Clawson, Extension Range Specialist, University of California, the removal of grazing from park land will allow the encroachment of brush into the open grasslands and in time oak woodlands will often give way to denser woody vegetation.

The Preliminary General Plan also calls for the restoration of native bunchgrasses in place of the non-native annuals. According to a study in 1982 of the Range Resources of Mt. Diablo State Park by Deborah S. Hillyard and James W. Bartolome "in California annual grassland, on no known site have the introduced annuals been replaced by native grasses, even with decades of protection from grazing ... At Mt. Diablo, data from sites protected from grazing for 40+ years suggests that perennial grasses in the oak understory may have limited success in reestablishing with proper management."

We urge the California Department and Recreation to consider the continued benefits of grazing for fire control and to provide such recognition in the Preliminary General Plan before it is considered by the Parks and Recreation Commission.

Sincerely yours,

GROVER W. ROBERTS Program Director

Public Lands

Commodity Services Division - FB12

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cc: California Parks and Recreation Commission

Contra Costa County Farm Bureau

Board of Directors

Nancy Dupont-President Dale Brooks-Vice President George Cardinet-Executive Director Robert Cooper-Secretary Doni Hubbard-Director Geoffrey Carter-Director



5301 Pine Hollow Road Concord, CA 94521 (415) 672-5072

Executive Committee

Hulet Hornbeck-Land Use Consultant Suzanne Hurst-Tahoe Rim Sue Davisson-Communications George Wagnon-Trails Chairman Bob Walker-Photo Consultant Sharon Saare-Industry Advisor

September 10, 1989

Mr. James A. Doyle
Department of Parks and Recreation
Planning Division
P.O. Box 942896
Sacramento, California 94296-0001

Re: Mt. Diablo State Park Management Plan

Dear Mr. Doyle,

I have attended and contributed to every public meeting your Planning Team has conducted on the Mt Diablo Management Plan.

My first visit to the park and areas now presently within the park was in 1939. I have constructed approximately 120 miles of the park's present 150 miles of trails. Through the cooperation of Congressman Baldwin and then Congessman Waldie I secured the additions of one 160 parcel and one 80 acre parcel to the park.

I knew Mrs. Angel Kerley through most of her life. I am fully aware of the negotiations attendant the sale of her property to the State and the generous gift of land which includes the Castle Rocks.

I continue to be aware of the sophistry and predeliction that is the hallmark of your Planning Team's conduct of the public meetings and their reporting of the same through the published plan. The Plan has no relation to the majority testimony at the public hearings. In fact, it is in defiance of the same.

To continue to advance a policy of non-grazing of grasslands when this is the purpose of the Creator in providing the same as well as the herbivore's to utilize them is a crime against Nature. Perversion of Nature follows logically once you have perverted the public process.

It is indeed most unfortunate that a wealth of cultural, historic and interpretive resources have been ignored and their utility unrequited in the pursuit of ideological predelictions.

Sincerely,

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George H. Cardinet Executive Director

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Alameda County Farm Bureau



638 Enos Way Livermore, California 94550 (415) 447-1993

September 8, 1989

Mr. James Doyle, Supervisor Environmental Review Section State of California Dept. of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

On behalf of the Alameda County Farm Bureau, I would like to give you our views regarding the Preliminary General Plan for Mt, Diablo State Park.

Grazing is important for reducing the amount of fuel in these highly productive grasslands. The Wildfire Management Plan does not provide any practical way to limit the accumulation of excessive fuel in the grasslands if grazing were terminated.

Removing all grazing animals would be a drastic change to the ever changing ecology. Grazing management within the park is exceptionally good, and it appears that any resource damage is very minor. At the present time only about 6% of the park is occupied by cattle. We feel the benefits of grazing far outweigh any possible disadvantages.

I understand the State of California was given 281 acres of the ranch as a sign of commitment to the demonstration ranch program. That fact alone, should play a part in the decision.

Sincererely, Sincererely,

Diane Andrade Manager

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President Howard Higgins Vice President Frank Pereira Tressurer Eugene Harrison Secretary A. Michael Souza Directors Mike Ambrosino Tino Bacchini Tom Brumleve Enrico Cinquini Bob Dal Porto Neal Draper John Mass Frank Nunes Tony Souza Earl Wetzel

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September 7, 1989

Mr. James M. Doyle Environmental Review Section Dept. of Parks and Recreation P.O. Box 942896 Sacramento, Ca. 94296-0001

Dear Mr. Doyle:

The Contra Costa County Citizens Land Alliance is a grass roots organization committed to the preservation of private property rights. Our membership consists of over 400 property owners in Contra Costa County.

We are writing this letter to voice our support for the continuation of grazing in Mt. Diablo State Park. There are a few reasons why we feel it is vital to the integrity of the Park and the County to continue to allow grazing.

We feel the most obvious and practical way of managing the land to prevent fires is to allow grazing. The grazing animals keep the grasses at manageable levels in the case of a fire. The most striking example of this was the fire of 1977, in which most of the up to 300 year old oak trees in the ungrazed grasslands perished; in the grazed area, virtually all of them survived.

We also feel that the State would be setting dangerous precedent if they were to no longer allow grazing on the Mountain. With the acquisitions slated by yourselves, East Bay Regional Park District, and Contra Costa Water District, over 60,000 acres of publicly rangeland will exist between Walnut Creek and the Alameda County line. If you were to adopt a no grazing policy, and CCWD would be sure to follow, virtually wiping out the cattle industry in Contra Costa County, displacing many families who have been in the cattle business for years. We feel this impact should be addressed in the Environmental Impact Report general plan.

Finally, we'feel the treatment of the owners of Diablo Ranch is unfair and borders on unethical. The State had

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no problem in accepting the 281 acres Angel Kerley donated, yet they are about to put her family out of business. The implication was that if Diablo Ranch continued the demonstration ranch project, the grazing contracts would be renewed. Diablo has had a very successful demonstration project over the years, yet you now want to kick them off the Mountain.

The members of the Citizens Land Alliance feel that the continuation of grazing in Mt. Diablo State Park would be beneficial to the owners of Diablo Ranch, the attractiveness of the Park, and the people of Contra Costa County. Please allow grazing to continue on the Mountain. Thank You.

Sincerely,

A. Michael Sbuza/C Secretary/Treasurer

Contra Costa Citizens Land Alliance

DIABLO PROPERTY OWNERS ASSOCIATION P.O. BOX 215 DIABLO, CA 94528

September 6, 1989

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation Sacramento, CA 94296-0001

Re: The Preliminary General Plan for Mount Diablo State Park

Dear Mr. Doyle:

I write to restate our position regarding continued cattle grazing on Mount Diablo. I represent the 340 households in Diablo, a community immediately adjoining Mount Diablo State Park. We are extremely concerned that eliminating cattle grazing from the Wildfire Protection Plan will increase the hazard to adjacent homes, wildlife, trees, and the natural resources of the mountain. Cattle grazing is very important for reducing the amount of fuel in these highly productive grasslands, thereby reducing the intensity of wildfires and making them much easier to control.

All of the homes in the Diablo Country Club will be put at high risk if cattle are removed. The possibility of loss of human life also greatly increases when excessive fuel builds up, and any wildfire that starts is much hotter and more difficult to control. All of the homeowners who are fortunate enough to live at the foot of Mount Diablo are also on the front line should a fire occur. Alot of people that live in this area ride, hike, and spend alot of time enjoying our Mountain. We believe the current range management that Diablo Ranch uses is excellent. By rotating the herds among 17 fenced areas, cattle occupy only six percent of the park at any one time and reduce the fuel to the proper level before being moved. This kind of land management preserves the park and it's resources. Resource experts confirm that grazing management within the park is exceptionally good. Neither the Wildfire Protection Plan nor the Preliminary General Plan offer any substitute measures to prevent fuel buildup. We urge you to amend the General Plan to include cattle grazing as an integral part of the wildfire protection for Mount Diablo.

We also want to urge you to consider the historical significance of Diablo Ranch and it's unparalled success in the Demonstration Ranch Program. This program provides so much education for our children--a program that could never be duplicated--especially by

Mr. James M. Doyle, Supervisor September 6, 1989 Page 2

the mini ranchero that is proposed. We also object that our tax dollars would have to pay for the alternatives that are proposed. Again, we urge you to amend the General Plan to include cattle grazing and the continuation of the Diablo Ranch Demonstration Program, and save our families and homes from destruction.

Sincercly,

Lawrence S. Comegy

Treasurer

:LSC

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Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation Sacramento, CA. 94296-0001

Re: The Preliminary General Plan for Mount Diablo State Park

Dear Mr. Doyle:

As president of the San Ramon Valley Horsemen's Association, I should like to express my personal concern, as well as that of our membership, which consists of well over two hundred horsemen, to the elimination of cattle grazing from Mount Diablo.

We are well acquainted with the Mount Diablo State Park, as we frequently conduct club rides and functions on the mountain; as well as help maintain trails and equestrian facilities within the park. Many of our members reside near the park and ride on a daily basis; others trailer in several times a month to ride within the park. Due to our intimate association with the park, I feel we are uniquely qualified to comment on the proposed General Plan for the park.

Eliminating cattle grazing will create unwarranted fire danger due to increased combustible material to fuel a potentialy devastating fire, such as the recent one in Yellowstone National Park. Much of the park, as well as the majority of it's plant and wild life would be destroyed in a major fire; not to mention the several private residences that adjoin the park land. It would seem that these homeowners would have reasonable legal recourse for any losses against the Department of Parks and Recreation if you move to eliminate grazing against all of the advise from the public sector.

Fire danger would increase year after year, as the land would eventually become brush land, full of thistles, poison oak, weeds, and scrub brush from lack of grazing. These lands would become unusable sections of the park, becoming more and more of a <u>real fire hazard</u>. The alternative would be to chemically control the plant growth, with the associated dangers of prolonged use of such chemicals to wild life, and possibly to humans after the rain water washes the

residue down to the residential areas. Discing the areas would create erosion, and the evential destruction of the mountain. Cattle grazing has been the most viable method of preserving our grasslands since this land was settled. It would seem ludicrous to embark upon a program that would destroy a natural treasure. It is our responsibility to preserve the natural beauty and ecological balance of the mountain for future generations to enjoy.

As developers continue to surround the mountain with subdivisions year after year, it becomes even more paramount to manage the park in a responsible, intelligent, and unbiased fashion, with an eye not only on the present, but the future as well. In just a few years, Mount Diablo State Park will be an island in a sea of subdivions and shopping malls, providing the only natural source of recreation for our children and grandchildren. History will be notably kinder to those of us that preserved, rather than ruined this natural island.

It would seem to me that a more prudent action would be to preserve the Diablo Ranch and it's Demonstration Ranch as designated by Angel Kerley in her negotions with the Department of Parks and Recreation. A real working cattle ranch will provide more benefit to the local communities as a real source of history, where school children can actually see how our forefathers raised, branded, and worked cattle in a real situation, as opposed to a Walt Disney type of weekend operation, which among its many shortcomings, would have to be funded by the tax payers.

I sincerely hope that you will consider the historical significance that cattle grazing perpetuates within the park through the associated Diablo Ranch. Elimination of the cattle will ultimately destroy the park and the mountain for our enjoyment and fulfillment, as well as that of generations to come.

Respectfully yours, Lacion Charles

Charlot Ann Wainio, President

San Ramon Valley Horsemen's Assoc.

cc: State Park Commissioners

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The CALIFORNIA STATE HORSEMEN'S ASSOCIATION

897 THIRD ST. • SANTA ROSA, CA 95404 • PHONE (707) 544-2250

September 6, 1989

Mr. James M. Doyle Environmental Review Section Dept. of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

As a member of the Mount Diablo Park Association, the California State Horsemen's Association strongly recommends that cattle grazing be allowed to continue on Mount Diablo. The Association feels that eliminating grazing would greatly increase the fire danger to both the parklands and the adjoining homes. It is extremely important that the amount of available fuel be reduced and be kept to a minumum. The hazards to the grasslands and oak trees are extreme during our hot dry summers.

I urge you to amend the General Plan to include cattle grazing as an intregal part of wildfire management on Mount Diablo. The Association also believes very strongly in the need to keep the Diablo Ranch a working demonstration ranch.

Again, we urge your support to keep cattle grazing on Mount Diablo.

Steve J. Herrera

State President

cco State Park Commissioners Mount Diablo Park Association

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Mr. James M. Doyle, Supervisor Environmental Review Section Dept. of Parks and Recreation P.G. Box 942896 Sacramento, Ca. 94296-0001

Dear Mr. Doyle,

I have reviewed the Mount Diablo preliminary General Plan dated April, 1989 and have the following comments.

Page 48- Hydrological resources-The policy statement for managment of water resources states that water sources will be maintained. Past State Park management practice has been to remove and destroy ponds, springs, and other improved water resources. The effect of this has been that surrounding populations of wildlife have died off. I believe that this policy is wrong, and a policy that encourages the management of natural resources to benefit plants and animals should be adopted.

Page 49- Paragraph 1- This statement regarding water pollution from the Mount Diablo Mercury Mine hardly mentions the natural pollution from the springs on State Park Land. All of this polluted water flows onto surrounding private lands and is a serious threat. I reccommend that a serious analysis of this situation be made.

Page 55 & 56- Fire Frevention and Suppresson. Referance is made to the "Wildfire Management Plan" and it is implied that this is a complete plan that is

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approved and endorsed by all interested fire agencies. Actually this is a semi-complete plan that has had some portions agreed to by CDF and local fire districts; but it is far from being either a complete or approved plan. This plan does not even have perimeter fuel breaks proposed for existing park lands. New aquistion lands have not even been addressed. Inis management plan, if implemented, will result in greatly increased fuel loads and the adjoining private lands will be overwhelmed by a fire coming out of the Park. I believe that a complete fire management plan must be prepared cooperatively and approved by adjoining fire agencies. Also, provision should be made to require an annual update and approval by all parties involved.

- Page 58 & 59- California Ground Squirrel- The severe threat
 to surrounding areas of ground squirrel population
 buildup is completely ignored. I suggest that the
 management policy for the squirrels be a
 cooperative matter with the surrounding owners,
 agricultural commissioners, resource district, and
 other interested parties.
- Page 60 & 61- Livestock Grazing. This analysis of grazing is completely unrealistic and not based on fact. A policy to use grazing for economic, fire hazard management, and other productive uses should be adopted.

Environmental Impact Element

Page 149-The first statement; stating that "implementation of this plan should cause no adverse effects on the environment", is simply not true or believable. Implementation of almost every policy listed will have adverse effects. Some, such as eliminating grazing and trying to implement a partial and incomplete fire management plan will result in disasterous adverse environmental impacts.

In summary; this plan is a document apparently intended to justify a pre-concieved notion of how to manage Mt. Diablo State Park. Many alternatives and critical management items are not addressed at all. One example; if grazing is eliminated, the economics of of the financial loss of a minimum of \$150,000 in grazing income is not considered. Further the cost of maintaining a practical, Management plan, (which is well over \$100,000) is not considered.

It will be an environmental and economic disaster if this plan, as proposed, is adopted and implemented. I recommend that a new plan be prepared in cooperation with local agencies and individuals that is reasonable, practical, and not impossible to implement.

Sincerely,

w.G. Morgan

Commissioner, East Diablo Fire District

Director, Contra Costa Resource and Conservation District

433 W.G. MORGAN

5 6040 MORGAN TERRITORY RD.

CLAYTON, CALIF. 94517

672-2458

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September 7, 1989

James M. Doyle, Supervisor Environmental Review Section Department of Parks and Recreation P.O. box 942896 Sacramento, CA 04296-001

Dear Mr. Doyle:

I have just read an article in the Ag Alert (August 30, 1989) concerning the Diablo Ranch and State intention on the Mount Diablo State Park. I would like to submit some thoughts based upon the information presented in that article.

Apparently the private business called Diablo Ranch is a profitable venture else Mr. Tom Brumleve would not be objecting so strenuously to the proposed State actions. As a profitable private business operation, it is employing citizens, paying Federal, State and County taxes and is thus contributing to the general well-being of our entire economy and society. Further, profitable farming enterprises constitute local "base industry" and thus have some multiplier effects on local employment, contributing even more to the local economy.

The article says that "opponents say grazing cattle destroy native vegetation, accelerate erosion of stream banks and just don't fit in a state park." I find that position curious because later in the same article a Mr. Stuart Hong ("a landscape architect with the parks and Recreation Department who is in charge of the General Plan for the Park.") is, in fact, recommending grazing cattle on said property.

If - as is said - the cattle "just don't fit in a state park" how is it that they fit okay if the State owns the cattle or if it is done via concession? I'm not even sure I understand why they "don't fit". That certainly doesn't sound like a factual based conclusion - more like a political belief. And in that case Mr. Hong's opinion should carry no more weight than any other single voter. He is (should be) employed for his professional skills - not to impose his "beliefs".

It is not clear how State owned cattle will not "accelerate erosion of stream beds levels or destroy native vegetation" when privately owned ones would — assuming for exercise that that is even the case in the first place.

Now, Environmentally speaking, the States proposal by Mr. Hong appears more damaging. The current utilization is 300 cows on 6000 acres. That is one cow per 20 acres. Mr. Hong's proposal is "..175 cows and calves on between 600 to 1000 acres around a historical ranch, and perhaps 10 longhorn cattle to demonstrate ranching's early days." So, 185 cows on 600 acres is one cow per 3.2 acres, and 185 cows on 1000 acres is one cow per 5.4 acres. Potential pressure on the environment is a function of density and the State plan proposes to increase said density by a factor of four to six times!

The State proposal seems to me to be a willingness to trade minimal pressure on 6000 acres for high pressure (and thus long term severe damage) on 1000 acres. And that, to me, is anti-environment.

Mr. James M. Doyle September 7, 1989 Page two

As far as range management goes, private farmers have displayed the ability over time to perform far greater that bureaucrats, their well-being depends upon it. In this case, 3 acres cannot supply the forage for one cow in these water short years. And maybe it can't in normal California summers — I'm not sure because I'm not a cattle farmer — just a citizen. But it seems misinformed to me.

Mr. Hong says "We cannot justify the amount of acreage being grazed." How so? What is the exact basis behind that conclusion? Judging from the other conclusions, the words "cannot justify" need to be looked into. Perhaps others "can justify" if a different methodology is used or if a different agenda is started with.

The wording in paragraph five is not consistent with Mr. Hong's statement "It's certainly something we'd like to continue, but we would like to cut down the grazing to about 1000 acres in the park." If the effects are as stated in paragraph five, why would the State "certainly like to continue it"? And concentrate it further? It doesn't sound to me that paragraph five is that functional. It sounds more like one party to an agreement is attempting unilaterally to change the deal. And if that's the case severe questions must be asked. Like — why isn't there anything in the article about the State offering to give back the 281 acres that was donated — and I mean give back without restrictions. Ten years certainly looks to this citizen like an implied contract. Diablo Ranch appears to be justified in relying and depending upon honorable conduct by the State.

Another curious line in the article is the one is which Mr. Hong expresses the concern that "fences for grazing in the park also lead visitors to conclude wrongly that the lands are private." What possible bearing can that have? Who cares if visitors don't understand ownership? But, may I suggest that a few inexpensive signs be put up declaring that the land is State-owned - if that is a big deal? Are my tax dollars being spent to insure that no citizen "wrongly concludes" the ownership status of various property throughout the State? What nonsense. The fences are to contain animals not define ownership.

Mr. Hong references "a wildfire management plan endorsed by fire officials," that does not include grazing. He does not address the questions: Where said "fire officials," asked specifically if grazing down burnable dry grass by cattle would reduce potential fire hazards in our long dry summers? Is the subject wild fire plan the only one that would work? Does Mr. Brumleve's position have merit? If there is less burnable forage is there a reduced potential for fire to start? Does not un-grazed grass, when dry, increase potential fire hazard-particularly when high quantities of "the public" are visiting the area?

The combination of high dry grass quantities (after a wet winter) and park visitors seems to this simple citizen as a highly combustible combination! Cattle grazing would reduce the potential. Mr. Hong's position seems totally ludicrous and poorly thought through when you think about it. It would set the stage for much greater environmental damage. Those old oak trees are valuable.

Mr. James M. Doyle September 7, 1989 Page three

The Diablo Ranch apparently has hosted 2500 visitors so far this year and has shown them how ranches operate. Apparently all who have chosen to come have been hosted. Thus, the social needs have been served by the private operator. That works out to about twelve (12) people per day – or so.

Comes now Mr. Hong wanting to have the State engage in running a Cattle Ranch to entertain 12, or 25, or even 50 people a day, to "demonstrate ranching's early days" around a "historical ranch" (whatever that is). Of course, government is famous for its ability to run a business—or should I say "inability". This "plan" would result in a cash drain on an already short supply of public funds that we desperately need in other areas. Spend my tax dollars on proper things like homeless, needy, education, job training, fighting drugs, crime etc. Don't spend them on cattle ranching and displacing profitable private business and jobs. Not only will you waste the money for bureaucrats pretending to be ranchers but in the process you will cancel out a tax-paying business enterprise and eliminate all the associated jobs and multiplier jobs — a source of further tax revenue generation. If State empoyees want to be ranchers let them come out here in the real world with us. Don't use my tax dollars for playing.

Apparently this "Plan" assumes herds of people will flock to Mr. Hong's old ranch. Well, why aren't they coming now? They apparently aren't being turned away. The "plan" seems to involve entertaining twelve or more people per day (people who are presently being entertained) at the expense of jobs and business.

Further, I don't know what is meant by a "Historical Ranch". Is Mr. Hong planning on spending public funds to construct a "Ponderosa Ranch" or something? If so, that is not our mandate to public officials — to spend money on amusement Park ventures. Leave that to Disney. I don't even see what is meant by "...demonstrate ranching's early days.". I think you should cause this area to be spelled out exactly and in detail, that is: What exactly do they think this is? My observations are that there isn't a hell of a lot of difference in cattle ranching itself between now and "ranching's early days". Any "Concessions" would have to be paid to do this "demonstration", I would assume. Is that continuing payment going to come from public money or is going to come from those twelve people?

Right now it appears that Diablo Ranch is providing opportunity for the <u>public that</u> wishes to do so to see a cattle ranch, it is doing so at no cost to the <u>public till</u>, is making a profit and paying taxes, is creating jobs, is properly managing the range at a non-abusive level (one cow per 20 acres) and is reducing fire potential. What more can you ask for? If you have people who have nothing better to do than this - fire them and use the saved salary dollars on better things. My goodness, you have 12,000 acres for people to prowl around. Can't both be accommodated?

State wants to pull plug on 'Demo Ranch' grazing

A rancher who grazes cattle in Mount Diablo State Park said he will lose his business if the state carries out new park management plans.

Tom Brumleve, manager of the Diablo Ranch and first vice president of the Contra Costa County Farm Bureau, said he urges other ranchers and Farm Bureau members to protest plans by the state Department of Parks and Recreation.

"We don't have anywhere to go," said Brumleve. "This will put us out of business."

The deadline is Sept. 11 to comment on the Preliminary General Plan for the park that the parks department issued in April.

The family-owned ranch, allowed to operate in the park as a "demonstration ranch" since 1979 under an agreement with the state, has ignited controversy because opponents say grazing cattle destroy native vegetation, accelerate erosion of stream banks and just don't fit in at a state park.

Mount Diablo State Park covers 18,000 acres and includes the 3,849-foot Mount Diablo, an historical landmark in California. State parks officials want to expand its use for an increasing number of visitors while preserving its natural and historical settings around the theme of an "inland island."

"We cannot justify the amount of acreage being grazed," said Stuart Hong, a landscape architect with the parks and recreation department who is in charge of the General Plan for the park. "It's certainly something we'd like to continue, but we would like to cut down the grazing to about 1,000 acres in

Fences for grazing in the park also

"We don't have anywhere to go. This will put us out of business."

lead visitors to conclude wrongly that the lands are private, said Hong. But Brumleve said the cattle help keep grasses down, reducing fuel for wildfires and preventing especially hot blazes that can kill oaks in the park. Hong said a wildfire management plan endorsed by fire officials does not include grazing.

Besides, said Brumleve, many native grasses are gone, and the state can't return the park to its native state. Brumleve said he disagreed that the cattle cause erosion and stream pollution, and said grazing enhances wild flower viewing.

The ranch itself is important in allowing people to see how cattle ranches operate, he said, noting that 2,500 people, including schoolchildren, have visited so far this year.

The General Plan recommends cutting back grazing acreage and the number of cattle, and running the scaled-down ranch as a concession to compare modern ranching methods with historical practices.

The plan calls for grazing up to 175 cows and calves on between 600 to 1,000 acres around a historical ranch, and perhaps 10 longhorn cattle to demonstrate ranching's early days. A grazing management plan would have to be completed before such a concession is allowed, according to the plan.

Brumleve said his family grazes 300 head of Hereford, Angus and Hereford-Angus crosses on 6,000 acres, a third of the park's span. Because he moves the cattle around, the herd never occupies more than 6 percent of the acreage at one inne, he said.

When the family came to an agreement with the state on running the demonstration ranch, Brumleve said he "took it on faith" after lengthy discussion that the state would allow the ranch to continue.

His mother-in-law, the late Angel Kerley, even gave the state 281 acres of the ranch as a sign of her commitment to the demonstration ranch program, he said.

But a change in parks department administration has turned against cattle grazing in the park, he said.

The state Parks and Recreation Commission is expected to make its decision on the General Plan Nov. 9, said Hong.

Interested people should send comments to James M. Doyle, Supervisor, Environmental Review Section, Department of Parks and Recreation, P.O. Box 942896, Sacramento, CA 94296-0001. They may also write the commissioners of the Department of Parks and Recreation, at the same box and ZIP code.



Compiled by the California Employment Development Department

(The data contained in this report is current as of August 23, 1989.)

CURRENT FARM LABOR SUPPLY

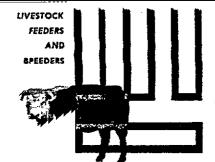
■ The number of surplus workers has begun to decline as grape harvest activities increase.

California-Grown

Fresh Whole Natural

ALMONDS

- In Fresno County, the worker surplus has dropped to around 500 workers. The raisin grape harvest is accelerating, but available labor has been more than able to meet the demand.
- Imperial County has a surplus of 2,500 or more workers. Melon thinning has started and land preparation is under way.
- In Kern County, there are approximately 600 surplus workers. Garlie topping has ended



TOOBY BROS.

• Res. Phone

P.O. BOX 5, FAIRFIELD, CALIFORNIA • Harrison 5-5779

September 11, 1989

Mr. James M. Doyle, Supervisor Environmental Review Section Department of Parks and Recreation P. O. Box-942896 Sacramento, California 94296-0001

Commissioners of the Department of Parks & Recreation P. O. Box-942896 Sacramento, California 94296-0001

Gentlemen:

I am a member of a family that has been in the ranching business for 125 years in the State of California.

My ancestors started in Humboldt County and then branched out into Trinity County and finally in Solano County. The size of our operation has substantially been reduced because of deaths in the family but I still have holdings in all of the counties named above.

In the arly 1900s my father and his brothers started in to take both cows and calves and sheep from Humboldt County into the summer ranches in Trinity County.

At that time the Indians would burn, in the Fall of the year, to keep down the brush on one side of Eel River and the next year they would burn on the other side of Eel River. This practice was to keep down the brush and by burning they had good feed for the deer and they made this a practice on all major rivers in Trinity, Humboldt and adjoining counties.

My father told me that he had adapted the same practice of Fall burning in which he would light the big blankets of leaves on many of the hillsides so that they would burn off and produce good grass the next coming year. He and his men did this while they were gathering in the Fall.

When the various forest services took over the administration of vast amounts of government land they opposed and stopped this practice of burning.

You may have already guessed it but now they've come full circle and they encourage the burning of this brush when it's possible by ranchers because so much brush has grown up since they stopped burning that when we have a fire now most times it burns lots of good timber and as a side issue, wipes

RECEIVED 441 SEP 1 3 1989 Mr. James M. Doyle The Commissioners Page Two September 11, 1989

out dozens of week-end homes.

Also the consequences of this moritorium on burning is now that the State Forest Service has requested \$1\frac{1}{2}\$ billion for the purchase of new equipment and financing of fire fighting crews to control the increased fire threat because of this vast accumulation of brush all over the State.

This new idea that the grazing of cattle is wrong because it doesn't mitigate some of the fire threat and also that the cattle destroy oak trees will eventually come full circle after we've had several years of real major fires that result from the combination of very high temperatures and heavy winds.

These major decisions made by people who have not had some practical experience in the area to supplement the educations that they have received in our universities make then handicapped in making a correct decision.

The feeling that the cattle are responsible for the destruction of the oak trees is not valid if you talk to working ranchers and they can show you where the deer are the major criminals responsible for this.

In my study of open space I have come across several illustrations of open space areas that's been acquired for the benefit of the city dwellers and in all cases, the number of livestock that they let a farmer run on these vast acreages is really ridiculous.

I would certainly encourage that this new innovation of minimizing the number of animals that can be run on this public owned land or the complete removal of animals be reviewed again and not make the mistake that the Forest Strvice made some 80 to 90 years ago.

Very truly yours,

Arthur H. Tooby

Concord ma Doyle -Supervison E.R.S. Sept PAR. I would like to point out a gross error in the Seneral Plan (Predeminary) for me Diable State Poach. The surrounding fine Chefs did not endorse the plan. I don't know if this was deliberate, as it appears, but it was on this fordorsement that the colourd of Supervisors approved the plan. Cattle should be allowed to graze an Met Deablo, both bon economic andertoly wasons in a controlled maren. SER. 19:1989 In July 1989 & fine on your property Till Deal both, bund onto my peoplely and

9-8-89

W Sept 8, 89 Carsed extensive damage Tour grass was oven d'tall and the brush was very thick No provision had been made to retardany fine. Odler - The vast amount of Poletion on Dunn Creek flows unrestricted from State Pork property, it is naturally occurring as is the restricted flow from my property which adjoinst Hallow from my property ile M Deabto mine is less than 1% of your flow 3 I f you are going to have allthet traffer of morgan Territory and marsh Creek hoods the State Park Dept should Contribute to road improvement.

Sincerely

Jack Messman

2430 morgan TerritoryPh,

Obyton 94517

Prailing address
2975 A-1 Treat Blod

Concord 94518

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URBAN CREEKS COUNCIL

THE PLANNING AND CONSERVATION LEAGUE



909 12TH ST., SUITE 203 · SACRAMENTO, CA 95814 · (916) 444-8726

September 8, 1989

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation P.O. Box 942895 Sacramento, CA 94295-0001

Dear Mr. Doyle:

Since our last correspondence the Mt. Diablo preliminary General Plan, now in the CEQA review process, has given PCL a renewed concern that the plan may fall prey to politically expedient compromises on the livestock grazing issue.

To reiterate our previously expressed concerns, PCL opposes the private use of public lands for commercial gain. Hiding behind the guise of an interpretive ranch is nothing more than a sham in an attempt to provide legitimacy to an otherwise illegal undertaking; that is, commercial exploitation of State Park System resources. A grazing lease by any other name is still an agreement to allow an exploitation of a "protected" resource.

Livestock grazing, regardless of its intended purpose, inevitably has associated impacts on the natural environment. Beyond the obvious physical adverse impacts, livestock grazing and the recreational values of parklands protected as a part of the State Park System are not compatible activities.

David Peconen, Berkeley
Bob Reab, San Anselmo
Dorila Rice, Tiburon
Antonio Rosamenn, San Francisco
Inconsistent with the legal definition of a state park
Herr Sweetwood, Sacramento
David Tam, Berkeley
Paul Wacks, Sant Francisco
Toronsistent with the legal definition of a state park
Found in the Public Resources Code.
Paul Wacks, Sants Barbara
Charles Warren, Sacramento
Charles Warren, Sacramento
Charles Warren, Sacramento
Norm Zafman, West Los Angeles

We note that the plan still proposes as a

We note that the plan still proposes as a preferred alternative in the Interpretive Element, that up to 1,000 acres of parkland be used to graze cattle for the purpose of interpreting the past and present

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cattle ranching activities. As we previously stated, though this proposal is certainly more reasonable than the current practice, we contend that ranching intrepretation conducted in a manner that exploits natural resources is out of context with and not within the responsibilities of managing state parks.

We are very concerned that alternative #2 of the Interpretive Element, if chosen, would permit the continuation of the present theme of private commercial gain from public resources. It is quite obvious that the present operator/interpreter is the only feasible participant and the only one to gain from this alternative. We are concerned that Secretary Van Vleck may be responsible for withholding the preliminary plan from public review until this provision was added to it.

Please provide PCL with the time and place of the State Park and Recreation Commission hearing so that we may appear and testify.

Sincerely,

Gerald H. Meral

Executive Director

Saraly 11 Meral

cc: Senate Rules Committee Members
Gordon Van Vleck, Secretary for Resources
Senator Boatwright
Assemblyman Baker

609 Forest Ave. Palo Alto, CA 94301 Aug. 31, 1989

RE: Mount Diablo General Plan/EIR

James M. Doyle, Supervisor Environmental Review Section Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle: -

It is our position that the ongoing cattle grazing at Mt. Diablo State Park is a clear violation of the Public Resources Code. It should be terminated as soon as possible. In fact, it should have been terminated years ago.

The plan clearly elucidates the unacceptable and very significant negative impacts of cattle grazing on the environmental and recreational resources of the park. It calls for the elimination of commercial cattle grazing in the park, as is required by law. In this, we strongly support the plan.

The draft plan provides for a small interpretive ranching operation, not to exceed 100 head and 1000 acres. While we are concerned about the impacts of such an interpretive operation, we are willing to see if it can be located and operated in such a way as to sufficiently limit its negative impacts. We would support reducing the size of this facility, and will strongly oppose any effort to expand it. As is stated in the plan, any expansion would clearly violate the requirements of the Public Resources Code relating to the State Park Classification and to commercial exploitation.

We wish to thank the Department staff for the good job that they have done on this difficult plan. We are looking forward to significant environmental improvements when cattle grazing is terminated at the park.

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Sincerely,

Dr. Robert Mark, Chairman

State Parks Committee

cc: State Park and Recreation Commission



September 9, 1989

California State Park and Recreation Commission Henry R. Agonia, Director California Department of Parks and Recreation James M. Doyle, Supervisor Environmental Review Section California Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Re: Preliminary General Plan and Environmental Impact Report for Mount Diablo State Park (April 1989).

Dear Commissioners, Director Agonia, and Supervisor Doyle:

Defenders of Wildlife submits this letter as our comments and recommendations on the above-referenced documents. Please consider our input, and include this letter in the appropriate administrative record.

We may also be represented at the Commission's November public hearing on this matter.

At the outset, we strongly support and applaud the generally enlightened resource management policies and recommendations described in these documents. For example, we endorse the positive "Resource Management" policies described on pages 4 and 5 of the Preliminary General Plan. We urge the Commission and Department to aggressively work for full implementation of all of these policies.

In addition, we strongly support and commend the proposal to reduce commercial livestock grazing from 7,500 acres down to about 1,000 acres or less for an interpretive program.

As accurately described in these documents, past livestock grazing has caused many significant adverse environmental impacts within this state park. These impacts include erosion, encouragement of exotic species, reduction in forage for native species, loss of oak regeneration, and damage to riparian habitats. From an aesthetic and recreational perspective, this livestock grazing also adversely affects the public's enjoyment of natural values by the obvious presence of cattle fences, the cattle themselves, and other intrusive developments. When people

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CALIFORNIA OFFICE: 5604 ROSEDALE WAY, SACRAMENTO, CALIFORNIA 95822 • (916) 442-6386 NATIONAL OFFICE: 1244 NINETEENTH STREET, NW • WASHINGTON, DC 20036 • (202) 659-9510 9-8356



see cattle, they may assume that portions of the state park are actually private lands and thereby avoid them.

Moreover, the alleged benefits of livestock grazing vis-a-vis fire suppression are exaggerated. Livestock grazing has actually changed the composition of plants in the park and exacerbated fuel loading, particularly during the summer months when fire may be the greatest threat. We generally agree with the discussion, entitled "Fire Prevention and Suppression," on pages 55 and 56 of the Preliminary General Plan. The best long-term approach is to eliminate or at least substantially reduce livestock grazing in the park, in combination with removal of exotic plant species and restoration of natural plant communities. By restoring native perennial bunchgrasses, fuel loading and fire hazards will be reduced in both grassland and woodland habitats.

We understand that there is a prohibition in the Resources Code on the commercial exploitation of resources within state parks. With this in mind, we are greatly disturbed to learn that the livestock permittee who has enjoyed grazing privileges in the park may be mounting a major campaign to stop necessary grazing reforms. If true, this campaign would appear to conflict with the prohibition on commercial exploitation of state park resources, since the motivation appears to be the financial benefit of one or more ranchers.

In any event, we urge the Commission and Department to not give credence or persuasive weight to any "lobbying" by ranchers seeking to continue livestock grazing in this state park. While disagreements over appropriate resource management policies are acceptable, they are "out of bounds" when driven by financial enrichment.

State parks are distinguished from so-called "multiple use" lands. In contrast to "multiple use" lands, where livestock grazing is considered acceptable, we believe that state parks management decisions should assume that such livestock grazing is not consistent with state park policies, unless there are no feasible less damaging or more natural methods to achieve proper park management objectives. In essence, the "burden of proof" in state parks should be against livestock grazing, because such grazing has known adverse impacts and is a commercial activity.

In summary, we urge the Commission and Department to support, adopt, and implement all of the positive policies and recommendations described in this Preliminary General Plan, including the



substantial reduction in livestock grazing.

We also request to be keptinformed on the progress of planning for this state park and the Commission and Department decisions relating to this park.

Thank you very much for your assistance, and for considering our views.

Sincerely, Richard Spotts

Richard Spotts California Representative Defenders of Wildlife

RS/js

cc: Interested parties

Winslow R. Briggs 480 Hale St. Palo Alto California, 94301

Sept. 8, , 1989

Mr. James M. Doyle, Supervisor Environmental Review Section California Department of Parks and Recreation P. O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

I understand that there is pressure to open up a substantial area of Mount Biablo State Park to grazing, and I am writing to register my protest. In 1983, there was similar pressure, prior to the development of a general plan, to open up large areas of Henry W. Coe State Park to grazing. At that time, I wrote the enclosed to documents, related to the issues surrounding grazing: specifically the impact on species composition, oak regeneration, wildfire management, brush management, water resources, and recreational values and potential. The California State Park and Recreation Commission ultimately approved a general plan that explicitly excluded grazing.

Though the enclosed papers were written with Henry W. Coe State Park in mind, they are equally applicable to the situation in Mount Diablo State Park. Grazing is simply not in the best interest of the people of California either from the point of view of resource preservation or recreational opportunity. The public deserves better.

Sincerely yours,

WMSlow R. Briggs

Winslow R. Briggs

cc. Mr. Manuel Mollinedo, Chair California State Park and Recreation Commission

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Grazing Impact - Some General Conclusions

1. Species Composition:

- A. Changes in grazing pressure can lead to complex changes in species composition increase or decrease in number depending upon direction of change and level at which change begins.
- B. Grazing leads to increase in weedy annual species (filaree, several thistle species, cat's ear, wild oat, ripgut), decrease in native species.
- C. Cessation of grazing leads to gradual increase in native grassland species, decrease of weedy species.

2. Oak Regeneration:

- A. Grazing represents the single most important factor preventing oak regeneration in California's oak-grassland complexes.
- B. Where cattle have been excluded but not deer (Stanford study) a high level of oak regeneration has occurred. Where cattle have not been excluded, there has been virtually no regeneration (Stanford study).
- C. In regions of Henry W. Coe State Park (original park) where cattle have been excluded but not deer, and there is a significant pig population, there is nevertheless some oak regeneration live oaks, blue oaks, valley oaks.
- D. Where cattle are present, they are the limiting factor for oak regeneration. In their absence, while other factors may be limiting, these factors vary from year to year, and will occasionally permit some oaks to become established.
- E. A minimum of 10 cattle-free years are needed to permit oak seedling establishment to the extent that the young trees could survive reintroduction of cattle (Stanford study).

3. Wildfire Management

- A. While grazing can have a positive effect on reduction of the fuel load for wildfires, this effect is relatively insignificant until serious overgrazing has occurred.
- B. Where sound range management has been practiced (e. g. in Sumol Regional Park), grass accumulation on slopes is often as great as on ungrazed grassland.
- C. The native perenniel grass species almost eradicated by grazing remain green significantly longer in the spring that the annual grasses which replace them under even mild grazing pressure. Thus the onset of fire danger can occur several weeks later when native grasses predominate.
- D. When grazing pressure is removed, the native grasses come back more rapidly in shaded areas, providing longer fire protection to the trees even when the open meadows are still completely dominated by annual introduced grasses.

4. Brush Management:

- A. While grazing can play a small role in preventing incursion of brush into grasslands, large areas of Henry W. Coe in which there has been no grazing for over two decades show no signs of brush incursion.
- B. Controlled burning mimics the natural environment in brush management in that fire has been part of the ecology of these inner coastal areas for centuries. Indeed many rare species only occur immediately after a fire, and certain closed-cone pines (knobcone, for example) require a fire for cone opening and perpetuation of the species.

5. Water Resources:

- A. Cattle, in congregating near water sources ponds, streams, springs severely compact the ground, and do grave damage to riparian species and habitats.
- B. Cattle, in congregating near water sources concentrate nitrogen wastes which then can stimulate heavy algal growth in these sources even if they are relatively rapidly flowing streams. There are examples of this phenomenon both in Sunol and Coe.
- C. Even if cattle are provided with water troughs and salt blocks in close proximity to natural springs, they will do severe damage to these springs.

I would be happy to provide documentation both from the scientific literature and from my own field observations for each of these statements.

Winslow R. Briggs, Ph. D.
Director, Department of Plant Biology
Carnegie Institution of Washington
and
Professor of Biology,
Stanford University
Stanford, CA 94305
(Name and address for identification purposes only)

Jan. 12, 1984

To: The Henry W. Coe State Park Citizen's Advisory Committee

The Use of Henry W. Coe State Park by the Public: The Impact of Grazing

The principal use of large areas of the back country of Henry Willard Coe State Park will be back-country travel. Such travel may have any of a number of objectives - fishing, swimming, learning, or just seeing and travelling through some extraordinary country. Such usage is clearly best served by wilderness designation. However, it is my conviction that grazing is wholly incompatible back country travel, whether within areas designated wilderness or not. Therefore, this presentation will address a single issue: the impact of grazing on public usage of Coe Park back country.

The Public Resources Code, of the State of California, Division 5, Chapter 1, Article 1.7. Section 5019.53 states unambigously: "Improvements which do not directly enhance the public's enjoyment of the natural, scenic, cultural, or ecological values of the resource, which are attractions themselves, or are otherwise available to the public within a reasonable distance outside the park, shall not be undertaken within state parks." Clearly grazing enhances none of these values. The following paragraphs amplify this statement.

Coe, as the second largest state park in California, uniquely represents the inner coast ranges and a kind of land form, vegetation, and fauna, which is typical of vast areas of the state. Such terrain is unrepresented in the state park system outside of Coe, and presents a priceless biological and recreational resource to the state. We have no moral or legal right to compromise the value of this resource.

Grazing - and in particular the kind of irresponsible and exploitive overgrazing carried out by the last two lease-holders within Coe - first on the Coit Ranch, and most recently on the Gill Mustang Ranch - is wholly inconsistent with the purposes for which state parks are established. Even in moderation, it seriously threatens both the biological resource itself and the recreational value.

Grazing Seriously Compromises the Biological Resources.

- a) Grazing perpetuates introduced annual grasses such as wild oats and ripgut, to the exclusion of a rich variety of native perennial grasses. In addition to their great genetic diversity, these native grasses remain green far later into the summer than do the introduced annual grasses making the former far less of a fire hazard than the latter.
- b) Grazing encourages course weedy species such as the milk thistle (Silybum marianum), Italian thistle (Carduus pycnocephalus), filaree (Erodium cicutarium), two species of Cat's ear (Hypocharis radicata and Hypocharis glabra), all classic indicators of disturbed pastures and overgrazing (and all to be found in profusion in heavily grazed areas of both the Coit and Gill Mustang Ranches) (see attachment).

- c) Grazing has a negative impact on species diversity. Not only is the diversity of plant species and the rich genetic potential in them severely reduced, but such reduction can hardly be without consequence to the diversity of insects, birds, small mammals, and even larger mammals. Coe represents a magnificent resevoir for such diversity one of the important reasons for acquiring it. We have no right to compromise this priceless biological resource.
- d) Grazing has a devestating impact on wet areas stream banks, lake and ponds shores, and springs. The wet areas which have been trampled and fouled by cattle are former riparian habitats which have been totally destroyed. The Gill-Mustang Ranch provides easily documented evidence for such damage of very recent origin. Most of the damaged wet areas will require between 15 and 20 years to return to some kind of biological (and aesthetic) normalcy. The damage is not permanent: just very long term and has no place in a state park.
- e) Grazing virtually eliminates oak regeneration. In old portions of Coe, young oak seedlings (valley oak, douglas oak, live oak, black oak), while not common, do survive the effects of deer browsing and pig foraging. The east slope of Middle Ridge provides ample evidence for such regeneration. In grazed areas there are no seedlings of any oak species. Indeed, even in relatively moderately grazed Sunol Regional Park, a recent four hour search failed to produce a single oak seedling. Grazing will most certainly destroy this California heritage. It could take a hundred years, but it is inevitable.

Grazing Severely Compromises Recreational Values and Potential

Ultimately the principle usage of the back country of Henry W. Coe State Park by members of the public - who voted for the bond issues to purchase its component parts, whose taxes will pay off the bonds, and who will pay fees to use it - will be long distance travel, either on foot or on horseback. State figures indicate that in 1982, roughly 2,000 backpackers registered for trail campsite use. Since Jan., 1, 1983, despite an extraordinarily rainy winter and spring, an additional 1,000 registered for trail campsite use. At an estimated 2.5 days per person, that is 7,500 person-days in the back country. Figures are not available for day travel, but if even one-tenth of the over 30,000 visitors to Coe Park during the past 18 months walked or rode horseback five miles or more (probably a conservative estimate) they represent an additional 3,000 person-days. Save for annual trail rides, recorded overnight use by horseback riders is small, although the potential is almost unlimited. The bottom line is that some 10,000 person-days were spent in Coe's back country since Jan. 1, 1982. With grazing, there are the following consequences to these users:

- a) 10,000 Person-days of dealing with trampled and fouled springs. Even with water purification measures, the notion of drinking from these water sources is thoroughly unpleasant. In Sunol Regional Park, where attempts have been made to manage grazing intelligently, every spring and seepage is ravaged even ones close to filled troughs and salt licks one of the very worst cases being just above the group backpack site a couple of miles from headquarters.
- b) 10,000 Person-days of dealing with trampled and fouled stream banks and lake and pond shores. The mats of algae in Orestimba and Red Creeks (and others)

attest to the extra concentrations of nitrogen provided by cattle urine and manure. These water resources are hardly attractive areas for recreational swimming or fishing.

- c) Damaged trails. Several trails in Sunol Regional Park show severe damage leading to erosion and rough footing. Cattle are clearly the cause.
- d) Physical fear of cattle. On a recent resource inventory field trip to the Gill-Mustang Ranch, our party attracted the attention of a large black bull, and had serious reservations about setting out.
- e) Severe aesthetic damage. Once again, Sunol Regional Park provide a good example. Large areas near the group backpack camp are covered with dense masses of thistles up to five feet high. The springs, as mentioned, are fouled and trampled. There is manure within view everywhere. And, even on a scorching July day in 1983 there was a thoroughly unpleasant profusion of flies.

Grazing and Fire Hazard

Moderate grazing will not significantly decrease fire hazard where it is at its most dangerous - on the steep slopes and ridges - since cattle will overgraze flatlands first before working their way into steeper territory. Wise management in Sunol Regional Park has still left slopes with dry grass as deep as in parts of Coe. Coe itself is surrounded by ranch lands with large areas of grass as long as that in the Park. As mentioned above, the native perenniel grasses remain green much later in the season, and are far lower fire hazards than are the introduced grasses perpetuated by grazing.

Conclusions

The few dollars gained by the state from grazing leases (dollars which not even come to the Department of Parks and Recreation) thus provide a pretty shabby deal to the public which provided the funds for purchase of the component parts of Henry W. Coe State Park, and who pay fees to the state to use it for the purposes for which it was purchased. Grazing does significant damage to the natural, scenic, and ecological values of such parkland, with a strong negative impact on both the biological and recreational resources. If the state allows grazing in Coe Park, it is doing a disgraceful disservice to the user public.

Respectfully submitted.

Winslow R. Briggs

A CALIFORNIA FLORA

PHILIP A. MUNZ

DIRECTOR, RANCHO SANTA ANA BOTANIC GARDEN
PROFESSOR OF BOTANY, CLAREMONT GRADUATE SCHOOL

IN COLLABORATION WITH

DAVID D. KECK
ASSISTANT DIRECTOR AND HEAD CURATOR,
THE NEW YORK BOTANICAL GARDEN

PUBLISHED FOR THE

RANCHO SANTA ANA BOTANIC CARDEN BY THE

UNIVERSITY OF CALIFORNIA PRESS

BERKELEY AND LOS ANGELES 1959

Some common indicator plants for overgrazing

FLORA

of the
SANTA CRUZ
MOUNTAINS
of

CALIFORNIA

A Manual of the Vascular Plants

John Hunter Thomas

STANFORD UNIVERSITY PRESS Stanford, California, 1961

140. Silybum Adans. Mark TRISTLE

Stout annual or biennial herbs with large prickly sinuate-lobed or pinnatifid mottled lvs. Heads large, solitary, terminal, nodding. Fls. purple. Invol. broadly subglobose, the

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phyllaries in many rows, stiff, spiny-margined and -tipped. Receptacle fleshy, bristly. Aks. glabrous, shining, flattened; pappus of several series of minutely barbed bristles and falling away from the ak. together because of the united base. Two spp., of Old World. (Old Greek name applied to thistlelike plants.)

World. (Old Greek name applied to thistlelike plants.)

1. S. Marianum (L.) Gaertn. [Carduus M. L.] Erect, branched, 1-2 m. tall, lvs.

3-7 dm. wide, with clasping bases and wavy or lobed margins bearing many yellow prickles; upper lf.-surface ± mottled with white blotches; heads 2.5-5 cm. broad; phylaries keathery, the spine 1-2 cm. long, or outer phyllaries mucronate; aks. glabrous, ca. 6 mm. long, spotted brown; pappus shining white; 2n = 34 (Heiser & Whitaker, 1948).

Common weed in cismontane pastures and waste places; natur. from Medit. region. May-july.

87. Silybum Adans.

1: S. marianum (L.) Gaertn. Fig. 249. Milk Thistle. Very common in disturbed habitats, along roadsides, and an indicator of overgrazing in pastures, fields, and meadows; native of the Mediterranean region. March-August.

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144. Cardous L. PLUMELESS THISTLE

Much like Cirsium, but pappus-bristles merely barbellate or smoothish. Plants biennial. Lvs. conspicuously decurrent, spiny. Large genus of Eurasia and n. Afr. (Ancient Latin name.)

Heads 1-2 cm. broad, invol. 1.5-2 cm. high.

The heads usually 1-5 at ends of branches; phyllaries with small rough hairs on margin and back

1. C. pycnocephalus

1. C. pycnocephalus L. Italian Thistle. Annual 3-18 dm. high, the stems slender, narrowly spiny-winged especially below; lvs. pinnatifid, to ca. 12 cm. long, the lobes and teeth spine-tipped, white-tomentose beneath, greenish but ± arachnoid above; heads

subcylindric; phyllaries not membranous-margined, # persistently floccose-tomentose; corolla-lobes ca. 3 times as long as the throat, rose-purple; aks. light tan or buff, ca. 20-nerved, 5-6 mm. long; pappus 15-20 mm. long, sordid.—Weed along roadsides, waste places, etc.; Sonoma Co. to Santa Barbara Co., San Diego Co.; natur. from s. Eu. May-July.

91. Carduus L. Plumeless Thistle

Involucral bracts scarious-margined, the tips not scabrous abaxially.

1. C. tenuiflorus

Involucral bracts not scarious-margined, the tips scabrous abaxially.

2. C. pycnocephalus

2. C. pycnocephalus L. Italian Thistle. Occasional in disturbed areas; San Francisco and Mosett Field; native of the Mediterranean region. May-June.

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Thomas

2. Erodium L'Hér. STORESBILL. FILAREE. CLOCES

Ours annual herbs. Lvs. usually at first forming close rosette on ground, pinnately scined, simple to pinnate, opposite, with 1 interpetiolar stipule on one side and 2 on the other. Pedicels commonly retrocurved in fr. Sepals 5. Petals 5. Stamens 5, alternating with 5 scalelike staminodia Style-column very elongate, the styles hearded inside, spirally coiled when freed from the central axis. Carpel-bodies narrow, spindle-shaped, indehiscent. Ca. 60 spp., widespread in temp. and semitrop, regions, some of importance for forage. (Greek, erodios, a heron, because of the long beak on the fr.)

8. E. cicutàrium (L.) L'Hér. [Geranium c. L.] Stems slender, decumbent, 1-5 dm. long, strigulose and glandular-pubescent; lvs. commonly 3-10 cm. long, pinnate, the lfts. incisely pinnatifid; stipules lanceolate; peduncles 5-15 cm. long, glandular-pubescent, slender; pedicels 2-10, glandular-pubescent, 8-18 mm. long; sepals 3-5 mm. long, short-mucronate and with 1-2 white bristles; petals rose-lavender, 5-7 mm. long, ciliate at the base, 2-spotted; style-column 2-4 cm. long, the coiled parts with several turns; carpel-bodies 4-5 mm. long, stiff-pubescent, the apical concavities glabrous, circular, without a subtending fold; 2n = 40 (Andreas, 1947).—Common everywhere in Calif., in open cult. and dry places below 6000 ft.; hatur. very early from the Medit. region. Feb.-May.

3. Erodium L'Her. ex Ait. Storksbill, Filaree, Clocks

4. E. cicutarium (L.) L'Her. Red-stemmed Filarce. Common in pastures, in disturbed areas, and on open grassy slopes; native of southern Europe. February-November.

170. Hypochoèris L. Cat's Ear

Annual or perennial herbs with lvs. in radical rosette or cluster and naked stems bearing a solitary head or a somewhat corymbose cluster of long-peduncied heads. Fis. yellow. Invol. cylindric or campanulate, with rather few lanceolate erect imbricated phyllaries. Receptacle flat, the bracts scarious, chaffy, thin. Aks. glabrous, upwardly scabrous, the body 10-ribbed, narrow-oblong or fusiform, truncate or beaked. Pappus-bristles plumose or some of outer shorter and simple. Ca. 70 spp., 12 in Eu., the others S. Am. (Greek name used by Theophrastus for this or some other genus.)

1. H. glabra L. Lvs. usually not deeply lobed, spatulate-oblong, 2-10 cm. long; stems 1-4 dm. high; heads campanulate, invol. 12-16 mm. high; ligules scarcely exceeding invol.; aks. dark brown, the outer almost 4 mm. long; pappus ca. 9 mm. long, tinged yellowish or brownish; 2n = 10 (Stebbins et al., 1953).—Weed in fields and waste places; natur. from Eu. March-June.

places; natur. from Eu. March-June.

2. H. radicàta L. Perennial; lvs. hispid, pinnatifid, 6-14 cm. long: stems 4-15 dm. high; ligules longer than the invol.; aks. brown, the body ca. 3.5 mm. long; 2n = 6 (Stebbins et al., 1953).—Weed about lawns waste places, etc., scattered stations in most of cismontane Calif., more abundant northward; from Eu. May-Nov.

8. Hypochaeris L. Cat's Ear

Plants perennial; leaves usually hispid on both surfaces; marginal achenes beaked; flowering heads usually about 2 cm. in diameter. 1. H. radicata Plants annual; leaves glabrous to sparingly hispid; marginal achenes usually not beaked; flowering heads about 1 cm. in diameter. 2. H. glabra

1. H. radicata L. Hairy or Long-rooted Cat's Ear. Very common in grasslands and disturbed areas; native of Eurasia and North Africa. February-August.

2. H. glabra L. Smooth Cat's Ear. Grasslands, pastures, and disturbed areas throughout the Santa Cruz Mountains; native of Eurasia and North Africa. March-September.

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Thomas,



california state park rangers association

September 8, 1989

Mr. James M. Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

Commercial grazing at Mt. Diablo State Park is not compatible with the purposes of that unit or of the California State Park System. It is prohibited by the Public Resources Code (Section 5001.65). Large scale grazing, such as at Mt. Diablo State Park is a commercial operation.

The adverse effects of grazing on natural ecosystems has been well-documented. Grazing damages riparian systems, reduces oak regeneration, pollutes streams and springs, increases ground squirrel population, and promotes the proliferation of thistles and other exotic plant species.

Barbed wire fences, which are necessary to livestock grazing operations, discourage public use, detracts from the natural scenery, and can be a hazard to park visitors and wildlife.

The justification of turning over 7,000 acres of this park for private, commercial use is counter to all the ideals and purposes of the California State Park System. It has long been the policy of the Department of Parks and Recreation to eliminate grazing for commercial purposes from the State Park System. Grazing has ended at Mt. Tamalpais, Anza Borrego Desert, Folsom Lake, Cuyamaca Rancho, Montana de Oro, Chino Hills, Henry Coe and many other units. Why should Mt. Diablo State Park be allowed to be degraded for private profit?

The relatively small number of visitors participating in the interpretive program dealing with cattle ranching, the extremely low fees charged for grazing, and the negative impacts on natural systems of Mt. Diablo State Park all point to the need to close this commercial exploitation.

Sincerely,

Donald Murphy President

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MT. DIABLO AUDUBON SOCIETY P. O. BOX 53

WALNUT CREEK, CALIFORNIA 94596 9 Sept. 89



James M. Doyle, Supervisor Environmental Review Section California Department of Parks & Recreation PO BOX 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle: RE:Cattle-Mt. Diablo

The time has come to give attention to the issue of cattle grazing on Mt. Diablo, in the State Park.

Without question cattle have done significant damage to riparian habitat all over Mt. Diablo and in particlar within the boundaries of the State Park. The increased HUMAN population in Contra Costa county, as well as though out the entire state will result in an increased use of park and parks areas by humans. Between the pressures created by cattle grazing and human usages of the park, the damage to habitat, water run-off, erosion and the like will be increased. The Preliminary General Plan suggests an annual increase in human use of 15%.

The Preliminary General Plan cites, for example (pg 117), a number of areas of "General Agreement": The first two are:

"Mount Diablo State Park is environmentally sensative, and should not be damaged by overdevelopment."

The natural and quiet character of the landscape is an important recreation value.

The Preliminary General Plan provides (pg 121) the following comment, with which we agree:

"Substantially reduce livestock grazing to that minimally needed to provide cattle-handling demonstrations (but not more than 1,000 acres). Note: Grazing will not be removed until the wildfire management plan is implemented".

RECEIVED

The comment and proposed control of cattle grazing in the Park

1 2498 been given great consideration and should be followed.

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RPD

Yours very truly

A. B. McNabney

Vice President-Conservation 9-8326



10 Sept 89, 10p.m. SIERRA CLUB 🐷 Santa Lucia Chapter PO BX 15955 San Luis Obiago, CA 93406

Dear Mr Doyle,

Earlier today at the foint Regional Conservation Committees meeting at Rancho El Choro, we heard a rejort on the Mt Deable Chelin. Gent Plan and The cattle graying peobleme related to The

From all I heard, I urge The support for your general plan for mr Diable. I hope it is enough to stop The erosion and allow time for nature to restore the Robitat for nature flante & animals.

Sincekely, Dininia Solvello



PEOPLE FOR PRESERVATION OF THE NATURAL AND WILD IN BAY AREA OPEN SPACE

47 LEVANT STREET

SAN FRANCISCO, CALIFORNIA 94114

PHONE (415) 861-5636

September 12, 1989

PRESIDENT Leonore M. Bravo

ORGANIZERS Stephen Brickley Evelyn Engel

PRESERVERS
Karl & Naomi Baumann
Desmond Bonnington
Charles Bonny
Richard L. Bower
Paul Covel
Edith Duarte
Nina Eloesser
Jean Glaser
Patrick McSweeney
Michael & Joanna McClure
Louise Richter
Dr. Edward S. Ross
Audrey Penn Rogers
Nan Tunison
Save the Redwoods League
California Native Plant
Society

A Partial List,

James M. Doyle, Supervisor Environmental Review Calif. Dept. of Parks and Recreation P.O. Box 942896 Sacramento, Cal. 94296-0001

Dear Mr. Doyle:

It seems that I have written numerous letters in the course of the development of the master flan for Mt. Diablo State Park. I am seriously interested in keeping the integrity of our great State Parks so that they will continue to provide a haven for City dwellers who don't have the money for a "cabin at the wake".

Without reiterating my comments to the State Park Commissioners I'll enclose a copy of my objections to grazing in Mt. Diablo State Park, or any other State Park as far as that goes.

I can remember well when I was growing up cut old enough to go hiking alone how I hated threading my way between the cow-flops on the Dispsea trail on Mt. Tamalpais, and how relieved I was when the dairy farmers finally lived out their extensions of time when the Park acquired that land. It was the same with the "cow trail" that ran from the top of the Dipsea to the Naturefriends clubhose at the top of Muir Woods. Renamed the "Sun trail".

The General Plan for Mt. Diablo State Park is a wonderful piece of work. I appreciated receiving a copy and would have commented on it sooner except that I was away travelling by cance through the Allagash Wilderness in the State of Maine. I just returned and hasten to add my voice to those who oppose grazing, as per my comments to the State Park Commission, enclosed.

Thanks to you and all those in the State Parks and Recreation staff who conducted the hearings and put together this good work.

Leonore M Eravo Bran

I used to feel threatened by the cows, especially on dark foggy days of which there were many.

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PEOPLE FOR PRESERVATION OF THE NATURAL AND WILD IN BAY AREA OPEN SPACE

47 LEVANT STREET

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September 12, 1989

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Desmond Bonnington

Society A Partial List.

Nan Tunison

Manuel Molinedo, Shairman, and Members Calif. State Park and recreation Commission ESERVERS Results of the Results of t

Ladies and Gentlemen:

This organization had taken a keen interest in the development of the Master Plan for Mt. Diablo State Park. It is an excellent piecs of work! But we must oppose any grazing in the Park. It is inconsistent with Michael & Joanna McClude sources by the public. protection of the natural resources and the enjoyment of those

The State Resources code clearly states that nothing shall Save the Redwoods League undertaken in a State Park which is an attraction in itself nor which is commercial. A ranching operation is clearly commercial and should be excluded. Secondly but of prize importance is the damage which cattle grazing do to the environment in terms of destruction of the plant cover with resultant soil erosion.

> Prescriptive burning is the correct solution for fire supression, not grazing cattle! I saw a demonstration of such burning at Mt. Diablo State Park. Since the method is controversial at the urban-wild land interface I wanted to learn all about it that I could. Certainly the program at Mt. Diable State Park was well done and I trust that it would be effective in reducing out-of-control wild fires as planned.

Even if cattle grazing were a proper solution to fire suppresion, the presence of cattle in what little wild space that we have for the regeneration of the body and soul given the stress of urban living, seriously degrades the experience.

It is very unesthetic to go out welking among the cowdung with its odor and flies. Same pollutes springs and streams. Walking amongst cows is not only unpleasant but threatening, especially if one is alone.

I know the pressures from proponents that you have upon you, but please stand firm; you have the Resources Code on your side as well as the sentiments of the majority of the public.

> Sinkerely yours te onore M Bravo

September 9, 1989

James M. Doyle, Supervisor
Environmental Review Section
California Department of Parks and Recreation
P.O. Box 942896
Sacramento, CA 94296-0001

Dear Mr. Doyle:

I am outraged that a proposal of an experimental cattle ranch on Mount Diablo State Park. Over the past few years we have learned what extensive damage can be caused by the introduction of non-native animals, plants and insects. Humans have intruded into every part of the landscape and for our efforts, we are left with small patches (in ecological terms "islands") of only partially molested parks.

Mount Diablo State Park is one of these and to think that now it too is being looked at in terms of monetary gain for a few rather than the heritage of the many, is **QUTRAGEOUS**, **DANGEROUS** and totally **IRRESPONSIBLE!**

Please reconsider this proposal. All of the arguments in favor of cattle grazing are without substance and can be settled in other non-threatening approaches to good land management.

Sincerely

Moonyeen A. Danzig Conservationist, Naturalist

2813 Naples Ave.

Half Moon Bay, CA 94019

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FALL RIVER - BIG VALLEY CATTLEMEN'S ASSOCIATION

P.O. Box 66 - McArthur CA 96056

Ernest Bruce - 1988-89 President Melvin Crum - Vice-President Albert Albaugh - Secretary-Treasurer

September 5, 1989

Mr. James Doyle, Supervisor Environmental Review Section State of California Department of Parks and Recreation P.O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Doyle:

The Fall River and Big Valley Cattlemen's Association would like to see the California Department of Parks and Recreation keep livestock grazing as an integral part of the management of Mt. Diablo State Park. Livestock production has been a important part of the California lifestyle. Removal of cattle from the Mt. Diablo would be a dramatic change from the way that range has been managed for years.

Please send me a copy of your proposed environmental impact statement with specifics of the impacts upon fire control and the lives of the permittees on that range.

Sincerely,

Ernest Bruce President

inest Buce

cc Governor George Deukmejian

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September 51, 1989

Mr. James Doyle, Supervisor Environmental Review Section State of California Dept. of Parks and Recreation PO Box 942896 Sacramento, Ca 94296-0001

Dear Mr. Doyle:

I am writing to support the Diablo Ranch and continued livestock grazing at the present level on Mt. Diablo.

The Diablo Ranch in its present status is serving the public in several ways. It manages its own property and the grazing property at its own expense. Should the preliminary general plan and environmental impact report fo; Mt. Diablo be accepted, grazing revenue to the state would be lost and the property management would become the responsibility of the state. To date, the Park Dept. has not indicated the source of extra funds to offset the Diablo Ranch's grazing fee to the Dept., nor to pay for fire hazard control and the proposed educational plan. The Diablo Ranch family has continued to be flexible in working with the Dept. of Parks and Recreation for the best interests of the public, the park and the ranch.

Diable Ranch provides a very important educational service to the children and parents in the area, at its own expense and initiative. The uniqueness of this operation as an educational benefit cannot be replaced by a contracted vendor as the Park Dept. proposes.

Loss of grazing on Mt. Diablo or any other state park property greatly increases the fire hazards, as is repeatedly stated by fire control experts. The local residents need the fire protection provided by cattle grazing in areas not easily accessible by modern equipment for regular maintenance.

RECEIVED

The Alameda County CattleWomen strongly urges revision of your general plan to continue cattle grazing on Mt. Diable.

SEP 1 1 1989 RPD

Thank you for your consideration.

Yours very truly,

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Karen Sweet President

cc: Governor Deukmejian

9-7924 8

Livermore Amador Valley Garden Club



August 30, 1989

Mr. Manuel Mollieneda, Chairman California State Recreation Commission P. O. Box 942896 Sacramento, CA 94296-0001

Dear Mr. Mollieneda and Commission members:

The Livermore Amador Valley Garden Club is in support of the proposed reduction of the grazing on Mt. Diablo.

One thousand acres is much more reasonable, because of the need for many recreational uses of the park. The garden club is concerned about the consequences of the livestock grazing. This can be damaging to the native plants and it must also effect the wild animals that live on Mt. Diablo.

We understand that the demonstration ranch would continue, but under control of the park staff. This would seem more logical. Our area is growing so fast we need to protect our oasis, "Mt. Diablo", as a place that we can get back to nature for a short while.

Thank you for your consideration.

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Development Division

Detty Nortrand

Betty Mostrand, President

Livermore Amador Valley Garden Club

9-7692

4698 Second Street

Pleasanton, California 94566

DECEMA D

SEP LI 1509

RPD

Member of the Diablo Footbills



Dictolat

Mount Diablo State Park

Response to Comments Regarding Grazing Issues Response to 8-28-89 letter Wicklinsen (CDF) to Snow (Resources Agency)

While it is true that CDF uses grazed areas to assist in suppression of ongoing wildland fires on Mount Diablo, this is opportunistic rather than premeditative.

The term "fire hazard reduction tool" implies that the principal purpose is fire prevention and control. Cattle grazing on Mount Diablo is not being conducted with fire protection as a primary objective. Indeed, it is a year-round operation where cattle are rotated to various large pastures for the purpose of beef production and/or profit (Hillyard and Bartolome, 1982).

To be a premeditative fire protection tool cattle would have to be forced to intensively graze in strategic locations with respect to fire suppression during mid-spring when annual grasses are curing. The cost effectiveness of this operation when compared with other premeditative fire protection activities such as mowing, discing, or burning is questionable. Such an operation would certainly not be cost effective from a rancher's perspective.

Even if this operation was conducted in conformance with recommended range management practices of 1000 pounds/acre post grazing residue (Clausen, et al., 1982; O'Brien, 1989), which it is not (Hillyard and Bartolome, 1982), the grazed zone itself will not stop a fire burning under weather conditions frequently encountered on the mountain (Wright and Bailey, 1982, Stechman, 1983). Either the zone must be severely overgrazed (Stechman, 1982) or a firebreak must be present within or adjacent to it.

The Preliminary General Plan states that grazing cannot be relied on as a management tool for fire hazard reduction, because grazing is not being conducted for this purpose.

Comment #1

The Wildfire Management Plan and the General Plan offer no substitute measure to prevent fuel buildup.

Response

The General Plan contains several programs which in combination are a significant improvement over past fire preparedness. First, the prescription burning program will create and maintain a fuel mosaic in the park's interior which will greatly assist wildfire suppression efforts and will reduce the potential for large conflagrations. It will also be used to enhance the perimeter fuelbreak system at specific critical points in non-grassland vegetation - Perkins Canyon, Fossil Ridge, Emmon Canyon, Blackhawk Ridge, and Donner Canyon. Second, the Wildfire Management Plan identifies all fire control logistics within the park to assist fire control personnel. It defines the location and maintenance of the perimeter fuelbreak system designed to interrupt the spread of large conflagrations. It also requires the control of open fires and public access during extreme fire weather conditions, thereby significantly reducing potential ignitions within the park. Finally, it utilizes the National Fire Danger Rating System to monitor

fire danger and to cooperate with the California Department of Forestry and Fire Protection (Deeming, et al., 1972; Deeming, et al., 1977). The Wildfire Management Plan will be updated periodically as needed.

The General Plan discusses fire preparedness on Department ownership in Mount Diablo State Park only. The General Plan does not discuss fire protection efforts on other ownerships. However, measures under the Wildfire Management Plan serve to contain fire within the park and prevent spreading to adjacent lands. Each landowner in the Mount Diablo area must comply with State fire laws and make a reasonable effort to protect structures from fire and restrict the movement of fires onto and off of their property. The Department has complied with State fire laws.

The Department believes that the Wildfire Management Plan provides the most environmentally sensitive approach to preventing overall fuel build up in grasslands, shrublands and woodlands. Techniques include maintaining existing fireroads, mineral soil firebreaks, thinning, pruning and removal of woody vegetation, mowing and discings of grasslands. Most all fireroads and fuel break grading has been done in the past and represents maintenance activities. Grading to mineral soil is accompanied by erosion control mitigation measures such as berm removal, outsloping ditching and culvert control in order to reduce channalization and gullying impacts to soil and stream course resources. (Also, see fire road standards on page 19 and 20 of the plan). Discing fuel breaks in grasslands is a continuing practice, but the plan provides greater control related to location, wildland scheduling than in prior years. Discing impacts are minor and of minimal duration. It can provide for increased water absorption. Vegetation restabilizes itself following discing.

The Wildlife Management Plan provides for reduction in woody vegetation in shrublands. This includes a removal of all vegetation to the width of 10 feet and thinning of 60-70% of a brush in a width of 15-25 feet. Thinning is done by hand with little soil disturbance. Dead material is removed from the site and properly disposed. Revegetation regularly takes place. Similar vegetation controls are proposed in the plan for woodland ares with the additional of limb pruning.

Comment #2

Because of fuel buildup, eliminating grazing will make fire hotter and more difficult to control.

Response

Grazing has no effect on fuel loads in shrub and forest communities. In grasslands and woodlands, grazing significantly reduces biomass only on gentle slopes (0-20%). Its effectiveness decreases drastically to zero for slopes exceeding 50% (Hillyard and Bartolome, 1982). Mount Diablo is a complex mosaic of vegetation types on steep slopes. Fire can start in and spread easily into all vegetation types including grazed areas. Thus, the proportion of land where grazing can significantly reduce fire intensity and facilitate control efforts is relatively small (California Department of Parks and Recreation, 1987).

Comment #3

Fuel is reduced to the proper level by rotating herds among 17 fenced areas.

Response

See also Wicklinsen response and response to #14.

Analysis of use of pastures in terms of forage consumed, and time of year by month according to records submitted by grazing concessionaire for payment of fees, and clipped plots in various locations in the unit as well as a general survey of the vegetation, indicated that there were four problems inherent in relying on grazing to reduce fuels (California Department of Parks and Recreation, 1987).

- 1. Because the lessee relies on the forage produced in the park for feeding his stock for the entire year, feed must be deferred so that forage will be available until fall precipitation initiates new growth. This deferred feed is essentially standing fuel that persists until it is eaten or decomposes. In order to maximize hazard reduction in grasslands, all fuel must be consumed as forage by the beginning of the fire season. In addition, the pastures that the lessee had chosen to defer for the five years preceding this analysis were along North Gate Road. This area has historically been a common area of ignition due simply to the fact that the road provides easy access.
- Fencing between pastures and roads creates a non-grazed strip of grass (and brush and trees) adjacent to the road; this small strip next to the roads is the most common area of ignition for human caused fires.
- 3. Behavior of cattle in a fenced area can be generalized to say that they will utilize level areas before and with more intensity than areas on slopes. This results in standing fuel being considerably higher on steeper slopes than it is on gentler slopes in level areas, as confirmed by clipped plots (Hillyard and Bartolome, 1982). Fire behavior is such that the same fuel will burn faster and with greater intensity with increasing slope. The combination of cattle behavior and fire behavior works counter to effectively reducing hazard where most needed, and results in most of the fuel reduction taking place in the areas that would benefit the least (where fires are most easily controlled).
- 4. Difficulty of control is a major factor in determining the hazard of a particular fuel type. The real hazard at Mount Diablo lies in the various shrub, woodland and forested vegetation types. Cattle have virtually no effect on these types (with the exception of an herbaceous understory, if present), and they constitute a major portion of the park. Grassland is mixed in with other more hazardous types in a complex mosaic with relatively small acreage per area of grassland. This arrangement of vegetation types into a small-scale mosaic results in fire being transmitted to a more hazardous type relatively quickly.

The wildfire management plan addresses the diversity and arrangement of vegetation types, slope, aspect, fire and fuel breaks, proximity to private land, and response capabilities of the various fire control agencies. The Department believes that this is a more comprehensive and reliable approach to planning for wildfires.

Comment #4

Eliminating grazing will increase the hazard to wildlife.

Response

Wildlife is dependent upon the plants, thus changes in plant composition and fire seasonality have altered wildlife populations. Just as native vegetation adapted to fire, so did wildlife in the pristine environment of California, which is well-documented. When the Department plans for prescribed burns, special studies are conducted to assess the impacts on wildlife, and precautions are then taken to minimize any adverse impacts.

Comment #5

The general plan represents an increase in the fire hazard to homes in the Black Hawk Development area.

Response

(See #s 1, 2, 10, and 11.)

Comment #6

The San Ramon Fire Protection District looks favorably on grazing our open space as a means of eliminating fire danger.

Response

Most fire districts look favorably on any activity, including grazing, that reduces fuel. No fire district, including the San Ramon Fire Protection District, would support the statement that grazing <u>eliminates</u> fire danger.

Comment #7

The East Bay Regional Parks District uses cattle grazing as their main means of fire prevention and is opposed to this current plan.

Response

The East Bay Regional Park District (EBRPD) has written to the State Department of Parks and Recreation (DPR), most recently on March 6, 1989, and has not taken a position in opposition to the preliminary general plan for Mount Diablo State Park. Rather, the comments received from EBRPD state that although they consider livestock grazing leases as a component of their land

management program, they recognize that DPR manages its lands under requirements of the Public Resources Code that may not be compatible with livestock grazing and, therefore, they respect DPR's decision to reduce grazing in order to meet other resource management goals (O'Brien, 1989).

Department staff have also reviewed the July 1989 East Bay Regional Park District Fuel Break Plan and the 1982 Report of the Blue Ribbon Urban Interface Fire Prevention Committee. EBRPD's primary effort to control wildfire entering or leaving their property is the maintenance of a fuel break system. EBRPD does not identify the use of cattle to maintain these fuel breaks. The Fuel Break Plan only includes the use of goats to control woody vegetation within the fuel breaks. Other fuel break techniques include chemical and mechanical methods, and a burn program. All of these methods, except goat grazing, are very similar to the techniques employed by DPR at Mount Diablo State Park. In fact, the Wildland Fuel Management Guidelines for the California State Park System is listed in the EBRPD Fuel Break Plan reference section. DPR is aware that EBRPD does consider cattle grazing to be a component of their overall plan, but does not rely on grazing to maintain fuel breaks.

In the Blue Ribbon Report, one section details a fire that consumed 146 structures. The report of the fire professionals states that "the single factor which we believe was most responsible for the loss of the 146 structures was the lack of clearance," referring to the "full legal clearance as required by Public Resources Code 4291." "It was also noted that in many locations the grass had been removed, or mowed, down to 4" or less. In some cases this removal of grass had been done by grazing animals... It was noted that even though the grass was down to 4" or less, it did carry fire into several of the structures that were lost."

Comment #8

The Wildfire Management Plan is incomplete and needs to be updated.

Response

The Mount Diablo State Park Wildfire Management Plan was approved in 1988 by this Department and the Department of Forestry and Fire Protection, with the concurrence, by signature of the fire chiefs, of every mutual aid fire protection district, including the East Diablo Fire District. The Plan was also endorsed by resolution of the Contra Costa County Board of Supervisors.

The plan will be reviewed annually, and additions and revisions will be coordinated again with the County's fire professionals.

Comment #9

The Wildfire Management Plan is good, but it is not a substitute for grazing - both are needed.

Response

The Wildfire Management Plan is not the only fire preparedness effort that the Department is making (see Response #1). Furthermore, cattle grazing does not constitute "fire planning" (see Wicklinsen response).

Comment #10

The perimeter fuel-break in the Wildfire Management Plan leaves large exposures of park grasslands, and chaparral and woodlands adjacent to residential areas with nothing to stop wildfires from sweeping down into these residential areas. Without grazing, fuel will build up in these areas, increasing the fire hazard to the residences and increasing DPR's liability.

Response

The perimeter fuelbreak is only part of a comprehensive fire planning effort (see Response #1). Furthermore, grazing alone does not prevent or stop fires, as was noted in the 1981 Atlas Peak Fire, where flames spread across a large expanse of grazed stubble 4" high and burned several structures. For this reason many of the residential areas around the mountain are required to have disced firelines within their open space.

Comment #11

Diablo Ranch is providing a service to the Blackhawk Country Club by grazing the common open space. Without the ability to graze Mt. Diablo leased lands, Diablo Ranch will not be in a position to graze our open space.

Response

It is not the Department's responsibility to provide such services for private lands. If the Diablo Ranch cannot continue to provide that service for Blackhawk Country Club, perhaps another rancher can. In addition, the landowner could consider incorporating fire prevention techniques outlined in the Wildfire Management Plan.

Comment #12

Marin County has returned to grazing the countryside because of the fires that were fed by excess fuel buildup.

Response

The County of Marin has allowed grazing on two of its properties, but it is not a widespread practice. Grazing was recently banned from the Roy's Redwoods unit near Woodacre because it was found to conflict with recreational use. Mt. Burdell near Novato has been grazed with cattle, however, presently cattle grazing is limited as part of a study of grazing effects on native perennials. The grazing lease at Mt. Burdell is intended

as support for local agriculture, not as a primary fire hazard reduction method. There is no long term agreement with the present grazing lessee. None of the other County open space lands are grazed (including many with extensive grassland areas).

The City of San Rafael grazes approximately 1100 acres with sheep for fire hazard reduction. No other city owned open space lands in Marin County are grazed.

Comment 13

Prescribed burning without grazing will not restore a native grassland community.

Response

It was neither stated nor implied on p. 56 that complete removal of grazing will improve the cover of native perennial bunchgrasses. The vegetation restoration and management plan will identify specific actions to restore this community, including appropriate techniques (which may or may not include fire, grazing by livestock, exotic species control, seeding, and planting).

The Department has conducted numerous prescribed burns resulting in the improvement and increase of native grassland communities. Other federal and state agencies have had similar successes with their burn programs (Barry, 1972). According to Daubenmire (1968), fire is essential in maintaining the vigor and vitality of grasses in most grasslands. Both Barry (1972) and Heady (1972) indicate that frequent fire is required to establish and maintain grasslands dominated by native grasses in lowland California. At a Lawrence Livermore Lab site where grazing was eliminated and annual burns have been conducted for over 30 years, Taylor and Davilla (1986) found that native grassland communities occur almost exclusively in areas subjected to annual controlled burning.

Comment #14.

Because perennial bunchgrasses go dormant in late summer when the fire danger is high, they may not be less flammable at that time.

Response

The conversion of perennial grasses to annual grasses has lengthened the fire season because of phenologic differences in the plant groups. As you mention, perennials do enter a period of semi-dormancy. Burgan (1979) states that even in this transition period perennials have a greater fuel moisture content than do annuals which cure very rapidly after death. Deeming, et al. (1977) gives cured ungrazed annual and perennial grasslands approximate equal levels of fire control difficulty. The perennial grasses tend to release more energy per area of ground but the annual grasses support a faster rate of spread.

Consequently, fires in fully-cured annual grasses are about equally difficult to control as fires in perennial grasses. However, since annual grasses are fully-cured for a longer period time than perennial grasses, annual grasslands constitute a fire hazard over a greater period of time than perennial grasslands, therefore the annuals are considered to be a greater fire hazard.

With regard to production comparisons between native perennial grasses and non-native annuals, recent research shows "A phenological characteristic of the native perennial grasses of the annual grassland type, one which was pointed out by Green and Bently (1957), Biswell (1956), Jones and Love (1945) and others, deserves reemphasis here. Established plants of the species included in this study (Poa scabrella, Melica californica, Koeleria cristata, and Stipa pulchra) produced 50-90% of their net foliage height growth and tiller production for the entire growing season during fall. This is in marked contrast to the growth pattern of the annual grasses, which produce only a small fraction of their total growth during fall and winter" (Dennis, 1989).

Comment #15

There is no evidence that prescribed burning is more effective than grazing in preventing wildfires.

Response

Response #1 describes the composite fire planning effort that the Department is conducting; it is more than just fuelbreaks and controlled burning.

Prescribed burning is a more effective method of preventing wildfires than grazing. First, it would take many cows several weeks to graze the acreage that can be burned in one day. Second, grazing leaves more residual matter than burning. Grazing according to recommended range management practices of 1000 pounds/acre (Clausen, et al., 1982; O'Brien, 1989) leaves sufficient residue to ignite and carry a fire under weather conditions that frequently occur on the mountain (Wright and Bailey, 1982; Stechman, 1983).

At Mount Diablo SP grazing does not reduce fuel in the areas or at the time of year to be most effective in reducing hazard. Roadside "ignition strips" are maintained by fences; reduction is much less on slopes, where the fire behavior is dependent not only on amount of fuel but the slope too; and due to the needs of the ranch, much of the forage is deferred into and through the high fire season, maintaining high fuel loads in some pastures until after the first fall rains.

The Department believes that Wildfire Management Plan is the most sensitive method to deal with the impacts of wildfire on sensitive physical and biological areas. The plans identifies, discusses and maps these sensitive areas in the "Resource Considerations" section of the individual "Fire Managements Compartment" descriptions. In this way, the Department can avoid and mitigate problems potentially caused either by presuppression activities or by fire.

Presuppression activities may include various methods of mechanical vegetation control (see Response \$1), chemical spraying and prescribed burning. It is the policy of the Department to approve for use only herbicides that are relatively nonpersistent in soils, water and the general environment. The broad application of herbicides in the park will not occur.

The chemical sprayed on roadside vegetation for fuel reduction to lessen the potential of fire ignition and spread shall be those herbicides that break down rapidly in the environment to prevent any lingering side effects or health hazards.

In planning presuppression activities and prescribed burning, the Department gives special consideration to biologically sensitive areas. Biologically sensitive areas are areas having sensitive biological or ecological resources that merit special consideration in planning and executing prescribed burn programs. Such areas usually are identified in the unit Resource Inventory, and broad management policies for the sensitive resources are specified in the unit Resource Element. Information on biologically sensitive areas is incorporated into programs initiated by the Wildfire Management Plan, including fuel and fire break plans and prescribed fire plans.

Biologically sensitive areas include: key habitat areas of rare, endangered, and sensitive species of plants and animals; areas having plant or animal species of restricted distribution (statewide); disjunct or edge-of-range species of plants and animals; research and demonstration areas; and areas with unique and valuable specimen plants.

It is the policy of the Department that plans for use of prescribed fire in biologically sensitive areas will require special attention to the sensitive values involved in each case to determine if the impacts of burning will be acceptable, or if application of special mitigative measures, including modification of the burn prescription, or even exclusion of fire, are necessary to prevent or minimize such impacts.

Sensitive areas shall be identified in the Unit Prescribed Fire Management Plan.

Project Burn Plans that will involve biologically sensitive areas shall include a description of mitigation measures to be taken; or if no such measures are planned, the reasons for not doing so shall be explained. Biologically sensitive areas shall be clearly delineated on maps included in Project Burn Plans.

These same policies will apply to all aspects of planning done to implement the Wildlife Management Plan at Mount Diablo State Park.

Comment #16

P.4 of Wildfire Management Plan, Table 1. The fuel load for grassland (ungrazed) should be 2-8 tons/acre, not 1 ton/acre as shown.

Response

The figure of one ton/acre available fuel was taken from the National Fire Danger Rating System fuel models for ungrazed annual (A) and perennial (L) in subhumid climate classes (deficient summer rainfall) (Deeming, et al., 1977). This represents an average cured biomass for the two fuel models. This figure underestimates biomass on grasslands of gentle slopes of the park but is appropriate for the steeper slopes.

The figures for all fuel models are provided to clarify the assumptions of this fire danger modeling system. The fuel load figure is not used to precisely predict fire behavior for a given site. Rather, it is used to predict the necessary level of regional preparedness that fire control agencies should plan for on a daily basis.

Comment #17

Fire intensities in ungrazed grassland would be 7-8 times greater than in grazed grassland. The height of standing fuel in ungrazed areas is 2-5 feet (mustard stands reaching 7-9 feet in some areas).

Response

In cured grasses most of the standing biomass is available to burn and ignites quickly. Fire intensity is roughly proportional to the amount of fuel available in cured grasslands because of the rapid complete combustion. The standing biomass on ungrazed grasslands of Mount Diablo averaged 4672 pounds per acre on level ground and decreased rapidly as slope increased (Hillyard and Bartolome, 1982). Intensive grazing according to recommended rangeland management practices at 1000 pounds per acre (Clausen, et al., 1982) represents a maximum 78% biomass reduction. This corresponds to an approximately 4 1/2 fold increase in fire intensity, not a 7-8 fold increase as you mention. On steeper slopes this reduction in fire intensity is much less.

Comment #18

If grazing can be used to restore native perennials on the demonstration ranch (Macedo), why can't it be done on currently grazed areas?

Response

The Department may consider grazing when part of a comprehensive program to restore the native perennial bunchgrasses, as a tool or technique. The plan does not say, nor is it meant to imply, that all impacts can be eliminated. Should we utilize grazing as a restoration tool, it may be necessary to severely alter the season, intensity and frequency of use to fit into an overall restoration plan. Thus, it may not be appropriate in those areas that we have leased for grazing and committed the herbaceous component to forage for livestock, in an agreement that will likely have economic benefits to the lessee that are contingent on a reliable, regular and possibly year round supply of forage. The goal of restoration is to achieve as nearly as possible native environmental complexes operating under natural processes. The Department does not have a singular goal of reestablishing native grasses

only. A native species, e.g. a perennial bunchgrass, manipulated by a non-native species, e.g. cattle, regardless of the effect, positive or negative, does not create an ecosystem controlled by natural processes. As long as the non-native species remains in the environment, native species will undergo unnatural changes. (see also Responses # 12, 13, 15, 16 and 17 above).

Comment #19

Oaks and other trees have adapted over tens of thousands of years to the less intense fires that occur under a grazing regime, but most would be doomed if grazing were discontinued and fuel allowed to accumulate in this very productive area.

Response

Native trees on Mount Diablo have evolved in the presence of periodic fires of variable intensity.

Although there are examples where wildfires on Mount Diablo have burned oaks and other trees, generally vegetation responses to fires are site-specific. As a natural process, fire has occurred historically both as relatively cool, less intense situations, as well as large conflagrations where many plants died. Although the renewal processes are sometimes slow, regeneration does occur even after high intensity wildfires that burn thousands of acres, ultimately returning to a climax stage.

The site-specific conditions that can burn trees include slope and other topographic condition, soil and plant moisture, vegetation understory (herbaceous or woody), and seasonal weather.

Oaks and pines are very susceptible to heat injury in the spring because the new leaves, elongated shoots and cambium are still succulent.

While many oaks can survive a total loss of their leaves from fire, an early season fire will interrupt the trees' ability to accumulate food reserves that will be needed for growth during the following spring (Wagener, 1961; Plumb and Gomez, 1983; Wright and Bailey 1982).

The intensity of fires in woody understories will generally be higher than fires in herbaceous understories, again being dictated by local site conditions at the time of the fire.

The change of California's prairie vegetation from perennials to annuals has changed the fire regime by lengthening the fire season. Annual plants complete their life cycles and are cured by mid-spring. Perennial grasses continue growth into early summer and remain at a higher moisture content than annuals well into the summer (Burgan, 1979; Bueth, 1967; Nord and Green, 1977; Green, 1977; Bentley, 1967; Maire, 1976; Deeming, et al., 1977).

Annual grasslands, grazed or ungrazed, can carry a wildland fire earlier in the growing season than perennial grasslands.

(See Responses # 3, 20, 24.)

Comment #20

In 1977, hundreds of oak trees were killed in some ungrazed grasslands while those in the grazed areas generally survived.

Response

The August 1977 wildfire was highly variable in its effects. In this wildfire, which occurred on the north side of Mount Diablo, the oak trees that were burned in the vicinity of Deer Flat succumbed as a result of very site-specific conditions. In the Deer Flat vicinity, the slope in the draw increases significantly. This can account for an increase in the fire intensity at this location. Another factor accounting for a fire intensity high enough to kill even large, old oak trees is the understory vegetation component where the majority of the large trees were killed. Due to soils and other site conditions, the understory vegetation at the location of the large trees killed was a shrub type, which has returned, accounting for the ability of the fire to burn hotter and higher into the tree canopy. A site inspection of conditions currently existing shows regeneration of vegetation in this area, including new oak seedlings and sprouts.

There are also examples of many trees, large and small, in the vicinity of those killed where the fire also burned but did not kill the trees. This also has to do with the specific local site conditions. Many of the trees not killed were on lesser slopes and had grass (ungrazed) understories.

Tree injury by fire is influenced by two general factors: a) the susceptibility of the tree to heat which is determined by the species, size, health and phenological stage at the time of the fire; and b) the exposure of the tissue to a lethal amount of heat which is determined by the weather, the characteristics of the burning fuel that exposes the tree to heat, and the pattern of the fire (heading, backing or flanking).

Comment #21

Organic matter not grazing regime influence water infiltration rates. Soil condition and infiltration rates are maintained or improved under light to moderate grazing regimes.

Response

A survey of the literature regarding cattle impacts on soil characteristics demonstrates a body of knowledge that supports the idea that light and moderate grazing regimes have similar impacts. However, most evidence indicates that as grazing intensity increases so does the magnitude of soil responses. As grazing pressure increases soil drying rates and water yield increase (Liacos, 1962a; 1962b; Warren, et al., 1984), bulk density increases (Liacos, 1962a; Willat and Pullar, 1983; Wood and Blackburn, 1984; Pluhar, et al., 1984) and sediment yield increase (Wood and Blackburn, 1984; Warren, et al., 1984; Pluhar, et al., 1984), infiltration rates decrease (Wood and Blackburn, 1981; Warren, et al., 1984; Pluhar, et al., 1984), and soil aggregate stability decreases (Wood and Blackburn, 1984).

In regard to erosion potential and terracing by livestock, recent research has shown that "Grazing steps, which may form within a period of several weeks, can intercept runoff, and thereby inhibit rill and gully formation. In doing so, they apparently increase the frequency of shallow slope failure by decreasing the time and amount of rainfall needed to saturate a hillslope soil to a point exceeding its stability for a given slope angle. This can theoretically lead to extensive straight midslope segments mantled by thin soils. Profiles of stepped hillslopes show that such midslope components are commonplace in the pastures of the Coast Ranges, as is the occurrence of shallow slope failure during the rainy season" (Howard, 1985).

"Therefore, hillslope soils may become saturated more quickly during storms. Assuming that permeability loss by soil compaction is not significant, and that the slope of the soil surface is unstable for saturated soils, formation of terracettes should increase the frequency of occurrence of soil slips" (Howard, 1985).

"Livestock grazing also tends to replace native perennial grasses with shorter-rooted annual grasses (Heady, 1975). This conversion may decrease the stability of hillslopes due to the loss of root strength" (Howard, 1985).

"The combined effect of terracettes and soil shrinkage cracks will tend to increase water infiltration rates over natural slope conditions. The presence of short-rooted grasses where deeper-rooted perennials once were can decrease inherent soil/slope stability. It follows that natural slopes subjected to livestock grazing, resulting in terracette formation and vegetation conversion, may become unstable in a given climatic regime. The net effect may be that soils are removed from slopes by mass-wasting processes as fast as they are formed" (Howard, 1985).

The General Plan's reference to soil compaction and loss of infiltration due to grazing was site-specific; areas of heavy clay soils adjacent to lower Mitchell and Donner Creeks, and southwest of Pine Ridge have had concentrated use during the wet season. These areas cannot be characterized as having "light or moderate grazing regimes." Removal of the cattle is the best management action to mitigate these damages.

Comment # 22

DPR's grading of roads and discing of firebreaks has been poor, creating an erosion potential that did not exist before when it was done better by local entities.

Response

A few years ago DPR significantly modified road grading and erosion control techniques along fire roads in order to reduce soil erosion to a minimum. Modifications to berming, ditching, and culverts have significantly reduced channelized runoff. Waterbars, rolling dips and road sloping improved drainage and reduced potential erosion. The in-place standards for fire road maintenance are consistent with standards used locally by other land managing agencies. The past years' fire road maintenance has been praised by specialists locally. Two years ago a contractor disced a fuel break wider

than was required. No erosional problems resulted from the contractor's work. In the past year corrective measures were taken so that fuel breaks were disced to proper widths.

Comment #23

Cattle prevent brush encroachment into grasslands.

Response

The encroachment of shrubs (brush) is a well-documented coastal phenomenon; however, areas at Mount Diablo SP that have not been grazed for over 50 years show no signs of shrubs invading into the grasslands (photos by Cooper [1914] and Biswell [1955] compared and discussed by Landers, 1962). Woody species are absent from both grazed and ungrazed grasslands; and in oak woodlands, no significant differences in woody understory cover were noted between grazed and ungrazed sites (Hillyard and Bartolome, 1982). Examination of historical photos (see Bowerman, 1944; Landers, 1962) show no change in the extent of shrub species after years of shifting management (including release from grazing). Coyote brush (Baccharis pilularis) which is cited as the primary species encroaching on grasslands of East Bay Regional Park lands (McBride and Heady, 1968), is only a minor component of the vegetation surrounding grasslands and woodlands at Mount Diablo. In addition, prescribed fire is an adequate management treatment for shrub encroachment (McBride and Heady, 1968) in the unlikely event that it should occur after grazing release.

Comment #24

Grazing by livestock on Mt. Diablo simulates effects that native herbivores such as elk & antelope used to have.

Response

The scientific literature does not support the contention that livestock grazing, in particular cattle, simulates the forage use or other effects of native grazers. The body of literature, rather, disputes the statement. Additionally, there is not much evidence to support the theory that native ungulates played a significant role in development and maintenance of California's native grasslands. In fact, there is some evidence to the contrary (Mack and Thompson, 1981), based on bunchgrass morphology, the fossil record, and inference from lack of dung beetle speciation in California.

Early reports show that "prior to the advent of Europeans the range lands of California were used only moderately by game. The principal species were pronghorn antelope, deer, and elk, none of which congregated into large migratory herds throughout the year after the manner of the bison" (Burcham, 1957). Further, "bison and cattle are both predominantly graminoid feeders. Either in semiferal range herds or when pastured, cattle frequently congregate. Local site disturbance by cattle through pasturing is analogous

to the reportedly severe grazing and 'wallowing' seen in bison herds." "Yet temperate grasslands and specifically steppes differ greatly in the extent of habitation by large mammals throughout the Neogene and hence the plants in these grasslands differ in the extent to which they have traits adapted to large mammalian grazers" (Mack and Thompson, 1981).

The literature indicates that the California prairie did not evolve with pressure by grazers; and that cattle more closely simulate bison than they do any California native grazers. Livestock have long been identified and associated with the decline of the native prairie in California (Burcham, 1957; Green and Bentley, 1957; Barry, 1972; Mack and Thompson, 1981).

Comment # 25

Cattle do not compete with deer for forage.

Response

Competition for forage between deer and cattle is well-documented. A review of the literature reveals several case studies that show positive correlations between deer and cattle foraging on the same species. Indirect impacts on deer from cattle also appear in the literature.

In Forestry Research West, Pearce (1988), in reviewing studies by Kie, Menke, and Loft, reveals "there are several ways livestock could adversely affect deer. By trampling low-lying foliage, cattle could reduce or eliminate the cover fawns use for protection against predators. Excessive grazing could alter the quality or amount of food available in a particular area, forcing adult deer to expend precious energy seeking food or shelter somewhere else." With regard to preferred habitats and forage, Kie states "all this suggests to me that as deer are being displaced from the preferred habitats they are going to the less preferred ones".

Other researchers have reported similar findings. "The importance of competition between mule deer and cattle has been the subject of considerable debate. Many authors have contended that only slight competition occurred, whereas others reported considerable overlap in the diet of these herbivores" (Bowyer and Bleich, 1984). Their results showed that "three deer and 166 cattle were found on cattle ranges, whereas 212 deer were tallied during spotlight counts of meadows where cattle were prohibited" in the same vicinity. "A significant difference existed between the mean number of deer in meadows where cattle grazing was permitted and meadows where it was not".

In their discussion of the results, these authors stated "although mule deer often are thought of as browsers, they require succulent forage for optimum growth and productivity, especially during spring...Cattle may limit deer populations by means of other than direct competition for food. Photographs documenting cattle grazing in Cuyamaca Rancho State Park in the mid-1950's indicated that stands of <u>Muhlenbergia rigens</u>, used by deer for concealment were badly damaged, but recovered once cattle were removed and further cattle use prohibited." Since the Department eliminated cattle grazing at Cuyamaca Rancho State Park, habitat conditions have steadily improved.

Comment #26

Livestock grazing is not responsible for poor oak regeneration.

Response

The Department recognizes that the widespread oak regeneration problem in California is a complex problem involving climate variation, seed production, and seed and seedling predation, and site factors (Griffin, 1980; Muick and Bartolome, 1987). However, cattle grazing has both direct and indirect impacts on oak regeneration. Not only do cattle consume acorns, they browse seedling oaks and show a preference for blue oak (Quercus douglasii) seedlings over other browsed species (Duncan and Clawson, 1980). Trampling and soil compaction which inhibits seedling establishment also reduces recruitment. A study ranking factors affecting seedling recruitment for blue oak in the Coast Range concluded that cattle have a greater negative impact on recruitment than deer (Borchert, et al., 1989).

Indirect influences involve habitat changes that support higher populations of seed and seedling predators such as gophers and ground squirrels (Rossi, 1980), and more soil moisture competition resulting from grazing and drought induced conversion of California's perennial grasslands to non-native annuals (Twisselmann, 1967; Holland, 1976).

Successful periods of blue oak regeneration have been correlated with reduced grazing pressures (McClaran, 1986). Although it is difficult to differentiate the relative impacts on oak regeneration from various factors, cattle grazing is one important pressure over which there is direct management control. Regeneration may not immediately improve after grazing has been removed, but the absence of cattle grazing allows for better survival when overall conditions promote recruitment (e.g. above average rainfall, high acorn production, and low ground squirrel densities). The vegetation restoration and management plan will address this problem in more detail.

Comment #27

The deer population in Mt. Diablo State Park, especially numbers of surviving fawns, appears to be declining since the introduction of coyotes to the park some years ago.

Response

There is no evidence, scientific or otherwise, that coyotes were ever purposefully introduced into Mount Diablo State Park. There is also no such evidence that coyotes have become a problem to deer, other wildlife, cattle or humans at the park. Many scientific studies exist related to coyote ecology, in particular their feeding habits and diet. Coyotes prey primarily on small animals (rodents and insects) and also consume a significant amount of vegetative material. It is rare that larger mammals fall prey to coyotes.

There is also no documentation that could lead to the conclusion that there has been a decline in fawn survival in the park. Even if such a decline was documented, there are many other factors that would need to be investigated before a conclusion could be reached. Other possible reasons for declining fawn survival could include disease, and reduced survival due to declining hiding cover during the fawning season.

Comment #28

The general plan should discuss the beneficial uses of livestock watering facilities for wildlife.

Response

In managing for wildlife, the objective of the Department is to protect and maintain native species and natural population levels. Artificial water sources such as stock ponds and troughs often promote and sustain a different wildlife community than would normally occur in the area. Therefore, artificial water sources are generally not considered beneficial to natural wildlife populations in State Park System units.

The preliminary general plan proposes additional and detailed investigations for restoring natural hydrologic resources to natural conditions. Such investigations will include wildlife benefits.

Comment #29

Spring boxes and water impoundments benefit wildlife. The Department has been destroying them. The impacts of removing these water developments should be discussed in the general plan.

Response

Refer to response to #28 (wildlife).

Comment #30

Ground squirrel numbers can be reduced by grazing. The Department should cooperate with surrounding landowners and others to control them.

Response

Ground squirrels prefer an open habitat, and can occur in significant numbers within their range when favorable conditions exist. Ground squirrels depend on an alert-watch system provided by open areas to warn of predators approaching. At Mount Diablo State Park in some locations where disturbances have created clearings or even bare ground, there has been a proliferation in the ground squirrel population. Where cattle congregate, bare ground conditions are often prevalent and can be widespread. In these areas, ground

squirrel populations have expanded to unnatural levels. There is no evidence that ground squirrel numbers have been reduced anywhere in the park by the presence of grazing.

The preliminary general plan proposes to control ground squirrel populations that exceed natural population fluctuations and balances.

Comment #31

The impacts of mercury pollution from springs on park land should be discussed.

Response

The Department, in cooperation with the Central Valley Regional Water Quality Control Board, has carefully analyzed the water quality of parklands adjacent to the privately-owned Mount Diablo Mercury Mine. Water from the springs on park property are not polluted. They are well within the acceptable levels of the standards applied by the State and federal water control regulatory agencies. Water draining onto park property from private property through the mine tailings does exceed the established standards. The Department will continue to cooperate with other agencies and private parties to alleviate hazardous water discharge levels.

Comment #32

The kind of grazing management practiced on Mt. Diablo preserves the park and its resources.

Response

Livestock grazing in the park largely perpetuates existing conditions, but significantly limits, and probably prohibits, opportunities to restore more natural ecological processes and to reestablish native plant and animal communities in accordance with the primary management policies.

The Department finds that grazing generally results in the following undesirable effects:

- Suppression of oak seedlings and other plants of interest to park visitors.
- Maintenance of Asiatic and European annual grass species in place of native perennial bunchgrasses, promotion of other undesirable plants.
- Proliferation of rodent populations, competition with native fauna.
- Severe disturbance of flora and fauna around springs, ponds and streams, loss of natural springs to piping for stock use, degradation of water quality.
- Extensive fencing which creates an unnatural park appearance and barrier to public use; marks and smells of cattle can dominate visitor experience of grasslands and woodlands.
- Compaction of soils increasing runoff, terracing of slopes, increased streambank erosion.
- Transmittal of diseases.

Mount Diablo was established as a State Park because its scenic and natural features were so outstanding that they deserved to be preserved in accord with Public Resources Code (PRC) 5019.53 which states, "... The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of such ecological regions of California as ... foothills and low coastal mountains ... Each state park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes."

The Department actively manages natural resources in order to restore and maintain native environmental complexes using natural ecological processes (DOM 1830).

The Department defines the terms "native" and "natural" as used in the PRC and the Resource Element to mean those features, conditions, and processes that evolved in California prior to the intervention of Euroamericans.

Cattle are not native animals, and therefore interfere in natural ecological processes. It is not possible to restore native environmental complexes if non-native species will remain as an integral part of them.

During the general plan process, the Department has carefully weighed the impacts of grazing as they relate to managing resources and recreation experiences. The Department has determined that the benefits of grazing do not outweigh the adverse impacts, and that grazing, therefore, is not compatible with the purposes for which Mount Diablo State Park was established with one exception. The Department believes that a portion of the park, up to 1,000 acres, can be grazed as a part of the proposed interpretive ranching program. Mount Diablo State Park was established to preserve its scenic and natural resource values, and not to preserve its ranching history, which then becomes a secondary consideration in managing this unit. The Department also finds that large scale grazing, as is currently conducted at the unit, represents commercial utilization of park resources and is a nonconforming use that shall be limited to no more than 1,000 acres for interpretive purposes.

Comment #33

On-going studies of "Holistic Resource Management" show grazing can increase populations of desired native perennial grasses. The general plan lacks reference to such studies.

Response

There is considerable disagreement about the usefulness or applicability of the "Holistic Resource Management" concept among professional range specialists. Results in California, as elsewhere, have not been conclusive about the use of this concept. The Department is unaware of any published results of ongoing studies in California mentioned as utilizing "Holistic Resource Management." Allan Savory, who developed HRM, has not published any paper that identifies an example in the United States or elsewhere where HRM has brought about long term improvement - with the exception of Kruger

National Park in Africa which has no livestock (Brown, 1988). The jury is still out on HRM; although it emphasizes many positive aspects of currently accepted range management, such as better cross fencing, uniform utilization, etc. This Department is interested in success measured in terms of range rehabilitation, not just increased stock numbers or weight gains.

One researcher found that, particularly near the coast, succession often shows the return of perennial grasses after the elimination of livestock grazing (Heady, 1977), while other research supports the opposite conclusion. A comparison of the native perennial bunchgrasses found at Mount Diablo and successful restoration of native grass stands in the vicinity of Mount Diablo may lead to the hypothetical conclusion that several native grasses were dominant in the landscape prior to invasion and conversion by non-native annuals. Those natives would likely have been Poa scabrella, Melica californica, and Koeleria cristata, rather than Stipa pulchra, which occurs as the most abundant native grass in the "disturbance" grasslands that exist today. There is mounting evidence that Stipa pulchra is the dominant native grass on Mount Diablo today because it is a species which survives disturbance more readily than the other natives, not because it was always the most common or dominant species. Recent research helps to verify this "Stipa appears, on the whole, to be favorably affected by clipping during much of its active growth period, while the other (native) species were adversely affected by nearly all clipping events which occurred prior to dormancy. This difference may, in fact, partially explain Stipa's current abundance in California grasslands relative to other (native) species studied here. In the absence of specific information about the species present, the fact that a grazing practice favors Stipa pulchra is not a good basis for assuming that it is likely to enhance populations of other native grasses... even if the effects of annual grass competition can be reduced by grazing during the growing season, this is unlikely to enhance growth of Poa scabrella, Melica californica, Koeleria cristata, or other species which resemble them in grazing response... it's clear from the results of both the field experiments and the planter box experiments in this study that the presence of the annual vegetation has a major adverse effect on growth of these perennial grasses... If grazing effects are even half the magnitude of the apparent clipping effects seen here, December grazing would result in considerable reduction of Poa, Melica, and possible Koeleria, while producing considerable enhancement of Stipa" (Dennis, 1989). (Words in parentheses added.)

If the Department in fulfilling the mandates of the Public Resource Code, attempts to restore the park's native environmental complexes, it may need to manage for several native grass species, which were possibly dominant species under pristine conditions, that are adversely impacted by livestock grazing. Under these circumstances, eliminating the effects of livestock grazing may be the only practical management technique. (See also \$\$ 13 and 18 above.)

Comment #34

The state should consider the Coordinated Resource Management Plan (CRMP) approach on Mt. Diablo. Agencies with expertise in range management, fire suppression, and management of wildlife should be invited to work with DPR to develop a plan to enhance natural plant communities.

comprehensive resource management and park planning for this Department. Beyond the technical training in these sciences, Department staff have the perspective and are in a position to apply these backgrounds to achieve the missions and legislative mandates that direct the Department's programs.

Comment #36

There is nothing in the Public Resources Code or the State Park Commission policies that prohibits grazing in state parks or imposes the above limitations if the Director and Park Commission finds it to be in the park's best interest.

Response

On the comment that nothing prohibits grazing in state parks or imposes limitations, there isn't a single regulation that applies. Rather, there are a number of policies, regulations, and statements that pertain to the issue of grazing on State Park System lands.

The State Park and Recreation Commission, in their Policy Number 31, state:

"Generally, grazing or agricultural leasing is considered incompatible in units of the State Park System. However, the director may permit grazing in the State Park System when it is for the benefit of the plan and purpose of the State Park System and the commission is advised of this action. The director shall carefully weigh the environmental consequences of grazing and agricultural leasing on the natural or cultural resources of any unit."

Senate Bill 713 (Presley), which became Chapter 439, Statutes of 1983, also defines the conditions under which grazing can occur. This legislation amended Section 5069.1 of the Public Resources Code and states in part that State Park System lands:

"may be made available for lease for agricultural purposes by the department if the director makes written findings that use of the real property for agricultural purposes would be compatible with the ultimate use of the real property as a unit, or part of a unit, of the state park system and with the sound management and conservation of resources within the unit".

Neither of the above explicitly prohibits grazing, but they do limit the possibilities to interim situations or instances where it can be demonstrated that the grazing would be compatible with the unit. e.g., interpretation or resource management.

Commission Policy Number 2, Integrity of State Park System Lands, again sets the tone for use of State Park System lands:

"Land acquired for the State Park System shall be dedicated to public use and protected against exploitation in accordance with its classifications, with the department's adopted Resource Management Directives, and as outlined in approved resource elements of general plans.

State Park System uses must not be in conflict with the department's Resource Management Directives, or with resource elements of general plans adopted for units of the State Park System.

Subject to provisions of law and to general policy established by this commission, the Director of Parks and Recreation shall, wherever possible, provide for the use of State Park System lands as classified and planned, and shall not grant nonconforming uses without the concurrence of the State Park and Recreation Commission."

The Public Resources Code is also pertinent to the issue. Section 5001.65 states:

"Commercial exploitation of resources in units of the state park system is prohibited."

Long-term grazing could be considered a commercial use of the resources, unless it was for the reasons indicated above.

The definition of the classification also influences the use allowed in units of the State Park System. Contrast the definitions of State Recreation Area and State Park.

"State Recreation Area - State recreation areas, consisting of areas selected and developed to provide multiple recreational opportunities to meet other than purely local need. Such areas shall be selected for their having terrain capable of withstanding extensive human impact and for their proximity to large population centers, major routes of travel, or proven recreational resources such as manmade or natural bodies of water. Areas containing ecological, geological, scenic, or cultural resources of significant value shall be preserved within state wilderness, state reserves, state parks, or natural or cultural preserves."

"State Park - State parks consist of relatively spacious areas of outstanding scenic or natural character, often times also containing significant historical, archeological, ecological, geological, or other values. The purpose of state parks shall be to preserve outstanding natural, scenic, and cultural values, indigenous aquatic and terrestrial fauna and flora, and the most significant examples of such

ecological regions of California as the Sierra Nevada, northeast volcanic, great valley, coastal strip, Klamath-Siskiyou Mountains, southwest mountains and valleys, redwoods, foothills and low coastal mountains, and desert and desert mountains.

"Each state park shall be managed as a composite whole in order to restore, protect, and maintain its native environmental complexes to the extent compatible with the primary purpose for which the park was established."

The Department is directed to "restore, protect, and maintain its native environmental complexes". This management direction generally precludes cattle grazing in state parks, because cattle grazing may have many effects on native environmental complexes. These effects are not necessarily negative or undesirable on private land dedicated to commercial cattle production, or even on public land managed under the multiple use concept. If park lands are managed in keeping with the Public Resources Code guidelines for State Parks, then cattle grazing would be a questionable use. In keeping with the guidelines and policies, a major emphasis of managing lands which were formerly cattle ranches as State Parks should be to insure compatibility with the general plan and primary purpose for establishing the park.

Taken collectively, the above policies and regulations have prohibited grazing, except for a few special instances where there is a clear benefit to the California State Park System (see Response #32).

Comment #37

Under the law, only registered professional foresters may prepare vegetation management plans (CDF).

Response

The Department has a variety of licensed professionals on staff to prepare and review management projects on State Park System lands including Surveyors, Civil Engineers, Landscape Architects, Geologists, and Foresters. The Mount Diablo Wildfire Management Plan was prepared in part and approved by one of the Department's Registered Professional Foresters.

Comment #38

Because of land development, we will be able to see cattle grazing only on protected land (i.e. parks) .

Response

It is not the mission of the State Park System to preserve commercial cattle ranching. Other programs such as the Williamson Act were set up for such preservation. State Park System lands should not be seen as ranchlands, but rather as parks where resources are preserved and recreation provided. However, since some members of the public wish to see a demonstration ranch continue, the general plan proposes one that would occupy one-seventh or less of the park land now subject to grazing.

Comment #39

Does the Department have any data on how park visitors perceive livestock in the park?

Response

Certainly there are diverse opinions as to the esthetic appeal of grazing livestock.

Based on a general survey at Mount Diablo State Park conducted by the Department in 1985, more than half of the responses from the more than 500 surveys returned indicated negative feelings toward cattle or their impacts in the park.

Some of the impacts registered by visitors include:

- 1. View of natural, park scenery diminished by grazing cattle.
- 2. Offensive smell of cattle and their waste.
- 3. Fear of being chased by cattle.
- 4. Pollution of surface waters.
- 5. Sounds of cattle are disruptive to quiet, contemplative activities.
- 6. Creation of unsightly multiple paths on steep slopes.
- 7. Fencing acting as a physical barrier to park lands.

Since the survey, the Department has received numerous letters on the subject of grazing, with mixed public reactions and feelings about cattle in the park. There are those who do not like seeing the cattle while other park visitors have voiced support for continuing some level of livestock grazing. Many of these people feel that viewing livestock, whether they are on a distant hill or adjacent to the roadways, is a positive feature of the park.

In a more recent case study on federal lands, people indicated a mostly negative reaction to grazing livestock (Sanderson, Meganck, and Gibbs, 1988).

As stated in the Preliminary General Plan, grazing of animals is appropriate for private lands and public lands managed for multiple commodity and recreational uses. This is not the case with Mount Diablo, a park created to preserve and protect the natural features for the enjoyment of the people, hence its classification as a State Park. In essence, Mt. Diablo is an island of natural features surrounded by encroaching development. The opportunities for recreating in "natural" environments are becoming more scarce in California, especially near large, urbanized areas. For those visitors who are interested, the Department of Parks and Recreation recognizes the importance of the historic ranching period in California, and provides for an interpretive demonstration cattle ranch operation of reasonable scale. Currently, the agreement allows for grazing on 54% of the total acreage of the unit.

Comment #40

The vegetation management goals put forth in the general plan are impossible or prohibitively expensive without grazing.

Response

The Mount Diablo SP Preliminary General Plan calls for vegetation restoration and enhancement through "appropriate restoration and management actions, including techniques such as fire and the control of non-native species." The vegetation restoration and management plan will address the use of different tools (which may include grazing). Should we choose to utilize grazing (or fire or any other restoration tool), the season, intensity, and frequency of use will be determined on the basis of reaching the objectives of restoring native environmental complexes. Evaluation of methods, techniques, and tools will consider cost, timing, potential for success and potential negative side effects.

Comment #41

Resource experts confirm that grazing management within the park is exceptionally good.

Response

Commonly accepted range management practices may be used at Mount Diablo State Park on an overall basis, but adverse impacts to natural resources are continuing to occur, especially in areas where cattle tend to congregate.

Provisions of the Public Resources Code and the Department's policies and Resource Management Directives require that the Department restore areas that have undergone deleterious influences. The Department considers good range management practices to be fundamentally different than good park management practices. The Preliminary General Plan proposes resource management strategies to meet park management objectives.

Comment #42

It is important to preserve a real working ranch.

"As traditional ranching is displaced from the Bay Area, it is important to preserve a real working cattle ranch. The ranch... is self supporting..."

Response

Those factors which have affected, and which continue to affect, the economic viability of the cattle industry in the Bay Area and elsewhere are beyond the Department's control. It is not within the Department's mandate or responsibilities to sustain any modern industry or enterprise. Additionally, the Diablo Ranch facilities are on private property and therefore the Department has no way of preserving these facilities.

Though the Department cannot preserve the Diablo Ranch, the general plan proposes to continue the public's opportunity to see cattle grazing and view live cattle-handling. Moving the interpretive ranching program to park property will permit greater public access to a broader range of ranching heritage interpretation.

Comment #45

Livestock grazing reduces the grassy competition helping insure wildflower displays. (Clyde Robin Seed Company)

Response

It is proven at the Lawrence Livermore site and elsewhere that native grasses and wildflowers can be restored with prescribed burns and without livestock grazing.

References

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